

**To:**  
**All members of the**  
**Cabinet**

*Please reply to:*  
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Date: 15 March 2018

### Supplementary Agenda

### **Cabinet - Wednesday, 21 March 2018**

Dear Councillor

I enclose the following items which were marked 'to follow' on the agenda for the Cabinet meeting to be held on Wednesday, 21 March 2018:

- |            |  |                |
|------------|--|----------------|
| <b>4.</b>  | <b>Recommendation from Overview and Scrutiny Committee</b><br>To consider the recommendation from the Overview and Scrutiny Committee on a review of the Code of Corporate Governance.   | <b>3 - 32</b>  |
| <b>5.</b>  | <b>Response to Heathrow Consultation - Key Decision</b><br><b>Councillors Barnard, Gething, Rybinski and Boughtflower</b><br><br>To agree the response from the Council to Heathrow's first public consultation.                             | <b>33 - 94</b> |
| <b>10.</b> | <b>Exempt report - Award of contract for provision of Insurance Services - Key Decision</b><br><b>Councillor Mitchell</b><br><br>To consider the award of a contract for the provision of insurance services.<br><br>Update report included. | <b>95 - 98</b> |

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Yours sincerely

Gillian Hobbs  
Committee Services

To the members of the Cabinet

Councillors:

I.T.E. Harvey (Leader)  
A.C. Harman (Deputy Leader)  
M.M. Attewell

C.B. Barnard  
M.P.C. Francis  
N.J. Gething

A.J. Mitchell  
O. Rybinski  
H.R.D. Williams

## **Cabinet – 21 March 2018**

### **Recommendation from the Overview and Scrutiny Committee of 13 March 2018**

#### **Review of Code of Corporate Governance**

- 1.1 The Committee received the report of the Monitoring Officer which explained that the Chartered Institute of Public Finance & Accountancy (CIPFA) and the Society of Local Authority Chief Executives and Senior Managers (SOLACE) had updated the Delivering Good Governance in Local Government framework. This framework defines the principles that should underpin the Council's governance structure. The new framework was broadly the same but the key principles had substantially changed.
- 1.2 The Committee noted that the Council's Code of Corporate Governance had been reworded to reflect the key changes in the guidance. The Code of Corporate Governance explains the definition of corporate governance and the main benefits. It lists the key principles and the evidence that will support how the requirements of each principle will be met. The updated Code of Corporate Governance is attached as **Appendices 1 and 2**.
- 1.3 The Code will support the production of the Annual Governance Statement (AGS) reported to the July Audit Committee, which helps to demonstrate how the Council's values, constitution and policies align to the new principles of governance.
- 1.4 **The Committee resolved** to recommend to Cabinet:
  1. that the updated Code of Corporate Governance be approved and
  2. that Cabinet recommend to Council approval of amendments to the Local Code of Corporate Governance in the Constitution.

**Councillor Sinead Mooney – Chairman of Overview and Scrutiny Committee**

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# LOCAL CODE OF CORPORATE GOVERNANCE

## 1. INTRODUCTION

- 1.1 Spelthorne Borough Council recognises the need to ensure that its affairs are managed in a way which achieves the highest standards of corporate governance. Corporate governance in this context means the systems, processes and values by which the Council ensures that it is doing the right things, in the right way, for the right people in a timely, inclusive, open, honest and accountable way.
- 1.2 On the basis that effective leadership is the foundation for effective corporate governance the Council commits:
  - ⇒ To engage in effective partnerships and provide leadership for and with the community
  - ⇒ To ensure the delivery of high quality local services whether directly or in partnership or by commissioning
  - ⇒ To perform a stewardship role which protects the interests of local people and makes best use of resources
  - ⇒ To develop citizenship, local democracy and communities

## 2. THE PRINCIPLES OF CORPORATE GOVERNANCE

- 2.1 The Council recognizes that its commitments for corporate governance need to be reflected in its working arrangements. The framework for corporate governance published by CIPFA (Chartered Institute of Public Finance) and SOLACE (Society of Local Authority Chief Executives) suggests, and the Council accepts, that the following core principles should be applied to its activities:

- ~~⇒ Focusing on the purpose of the Council and on outcomes for the community and creating and implementing a vision for the local area.~~
- ~~⇒ Councillors and staff working together to achieve a common purpose with clearly defined functions and roles~~
- ~~⇒ Promoting values for the Council and demonstrating the values of good governance through upholding high standards of conduct and behaviour~~
- ~~⇒ Taking informed and transparent decisions which are subject to effective scrutiny and managing risk~~

- ~~⇒ Developing the capacity and capability of councillors and staff to be effective.~~
- ⇒ Behave with integrity demonstrating strong commitment to ethical value and respecting the rule of law.
- ⇒ Ensure openness and comprehensive stakeholder engagement
- ⇒ Define outcomes in terms of sustainable economic, social, and environmental benefits
- ⇒ Determining the interventions necessary to optimise the achievement of the intended outcome
- ⇒ Manage the entity's capacity, including the capability of its leadership and the individuals within
- ⇒ Managing risks and performance through robust internal control and strong public financial management
- ⇒ Implementing good practices in transparency, reporting, and audit to deliver effective accountability

The detail of what is covered by each principle and the Council's approach to each is set out in the **Appendix**.

### **3. ARRANGEMENTS FOR CORPORATE GOVERNANCE**

- 3.1 The Council has established structures, procedures, processes and a system of controls to ensure that the necessary standards of corporate governance are achieved and maintained. It first reviewed these against the framework for corporate governance published by CIPFA (Chartered Institute of Public Finance) and SOLACE (Society of Local Authority Chief Executives) in April 2002. Since then it has reported on a regular basis to the Overview and Scrutiny Committee. In 2015~~8~~ the Council reviewed its arrangements for corporate governance taking into account the revised framework published by CIPFA and SOLACE in the 2012~~6~~ addendum– “Delivering Good Governance in Local Government”.
- 3.2 Most of the arrangements are set out in the Council's constitution and supporting policies and documentation. However, the Council recognises that these arrangements must be kept up-to-date and need to be kept under review to ensure that they remain appropriate and are improved where possible. Without proper monitoring, the effectiveness of the Council's arrangements could be compromised so the Council will ensure that systems are in place to monitor compliance with the agreed processes and procedures including the Annual Governance Statement and the Review of the Effectiveness of the System of Internal Audit.

- 3.3 Various staff members have responsibility for different areas of the Council's corporate governance arrangements. The majority of these responsibilities are established in the Council's constitution. These responsibilities will change over time as the Constitution develops and management structures change. However, overall responsibility for ensuring that the Council's Corporate Governance arrangements are followed and that they remain adequate, lies with the Chief Finance Officer.
- 3.4 Councillors will need to be assured that the activities of the Council are properly controlled and the Chief Finance Officer will be responsible for providing the Cabinet with an annual report on compliance with the arrangements and any actions required to improve these.
- 3.5 In addition, the ~~Heads of~~ Audit ~~Services~~ Manager and Head of Corporate Governance will review the Council's arrangements against the Code and the standards laid down in the CIPFA/SOLACE framework and will ~~report annually to~~ advise the Overview and Scrutiny Committee as necessary on the adequacy and effectiveness of the Code and the extent of compliance.

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### How Spelthorne Borough Council intends to meet the Principles of Good Corporate Governance

This Appendix sets out how Spelthorne Council aims to work to the principles of good Corporate Governance.

#### What is Corporate Governance?

Corporate Governance is about the systems, processes and values by which Councils operate and by which they engage with, and are held accountable to, their communities and stakeholders.

Spelthorne Borough Council is committed to the principles of effective corporate governance and has therefore adopted a Code of Corporate Governance which follows the latest guidance issued by the Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Authority Chief Executives (SOLACE), entitled “Delivering Good Governance in Local Government (2016)”.

The guidance defines the seven core principles, each supported by subprinciples that should underpin the governance framework of a local authority.

- A - Behaving with integrity, demonstrating strong commitment to ethical values and respecting the rules of law.
- B - Ensuring openness and comprehensive stakeholder engagement.
- C - Defining outcomes in terms of sustainable economic, social and environmental benefits.
- D - Determining the interventions necessary to optimise the achievement of the intended outcomes.
- E - Developing the Council's capacity, including the capability of its leadership and the individuals within it.
- F - Managing risks and performance through robust internal control and strong public financial management.
- G - Implementing good practices in transparency, reporting, and audit, to deliver effective accountability.

### **What are the benefits of having a Code of Corporate Governance?**

Good governance leads to good management, good performance, good stewardship of public money, good public engagement and ultimately good outcomes for citizens and service users. It enables the Council to pursue its vision effectively as well as underpinning that vision with mechanisms for control and the management of risk.

The Council has a robust governance framework in place. The documents and arrangements which comprise the framework demonstrate that the Council continually seeks to ensure it is and remains, well governed, through integration of its processes and structures with the core principles of the CIPFA/SOLACE framework into all aspects of the Council's conduct and operation.

The Monitoring Officer is responsible for ensuring the Code is reviewed regularly, and the outcome of the review, along with any required amendments is reported to the Overview and Scrutiny Committee for approval.

## Principle A - Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.

### Summary:

Local government organisations are accountable not only for how much they spend, but also for how they use the resources under their stewardship. This includes accountability for outputs, both positive and negative, and for the outcomes they have achieved. In addition, they have an overarching responsibility to serve the public interest in adhering to the requirements of legislation and government policies. It is essential that, as a whole, they can demonstrate the appropriateness of all their actions and have mechanisms in place to encourage and enforce adherence to ethical values and to respect the rule of law.

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
<b>Behaving with integrity</b>	<p>Ensuring members and officers behave with integrity and lead a culture where acting in the public interest is visibly and consistently demonstrated thereby protecting the reputation of the organisation</p> <p>Ensuring members take the lead in establishing specific standard operating principles or values for the organisation and its staff and that they are communicated and understood. These should build on the Seven Principles of Public Life (the Nolan Principles)</p> <p>Leading by example and using the above standard operating principles or values as a framework for decision making and other actions</p> <p>Demonstrating, communicating and embedding the standard operating principles or values through</p>	<p>Maintain shared values between the Council and its officers. These are defined in the Constitution and reflect public expectations about the conduct and behaviour of individuals.</p> <p>Use shared values as a guide for decision making and as a basis for developing positive and trusting relationships within the Council. We demonstrate this by adherence to the Constitution.</p> <p>Have adopted formal codes of conduct defining standards of personal behaviour for Members and Officers</p> <p>Maintain a Committee to support the Members' Code of Conduct Committee to raise awareness and take the lead in ensuring high standards of conduct are embedded within the Council's culture.</p>	<ul style="list-style-type: none"> <li>The <a href="#">Constitution</a> which includes: <ul style="list-style-type: none"> <li>Financial procedure Rules</li> <li>Contract Standing Orders</li> <li>Anti-Fraud and Corruption Policy</li> <li>Anti-Bribery Policy</li> <li>Rules relating to members external interests (Register of Interests)</li> </ul> </li> <li><a href="#">Human Resources Policies</a></li> <li><a href="#">Staff Induction Procedures</a></li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	appropriate policies and processes which are reviewed on a regular basis to ensure that they are operating effectively.		
<b>Demonstrating strong commitment to ethical values</b>	<p>Seeking to establish, monitor and maintain the organisation's ethical standards and performance</p> <p>Underpinning personal behaviour with ethical values and ensuring they permeate all aspects of the organisation's culture and operation</p> <p>Developing and maintaining robust policies and procedures which place emphasis on agreed ethical values</p> <p>Ensuring that external providers of services on behalf of the organisation are required to act with integrity and in compliance with ethical standards expected by the organisation</p>	<p>Have put in place arrangements to ensure that Members and officers of the Council are not influenced by prejudice, bias or conflicts of interest in dealing with different stakeholders. We have put in place appropriate processes to ensure that these arrangements are workable including declaration of interests and anticorruption policies.</p> <p>Ensure that systems and processes for financial administration and control together with protection of the Council's resources and assets comply with ethical standards; and are subject to monitoring of their effectiveness.</p>	<ul style="list-style-type: none"> <li>• Members' Induction Procedures</li> <li>• <a href="#">Member's Code of Conduct</a></li> <li>• <a href="#">Staff Code of Conduct</a></li> <li>• <a href="#">Scheme of Delegation to officers</a></li> <li>• <a href="#">Information Security Policy</a></li> </ul>
<b>Respecting the rule of law</b>	<p>Ensuring members and staff demonstrate a strong commitment to the rule of the law as well as adhering to relevant laws and regulations</p> <p>Creating the conditions to ensure that the statutory officers, other key post holders, and members, are able to fulfil their responsibilities in accordance with legislative and regulatory requirements</p>	<p>Ensure that professional advice on matters that have legal or financial implications is available and recorded well in advance of decision making if appropriate.</p> <p>Officers will actively recognise the limits of lawful activity placed on them but also strive to utilise their powers to the full benefit of their communities.</p> <p>Officers will observe all specific legislative requirements placed upon the Council as well as</p>	<ul style="list-style-type: none"> <li>• <a href="#">Money Laundering Policy</a></li> <li>• <a href="#">Whistle-blowing Policy</a></li> <li>• Rules relating to members external interests (Standing Orders)</li> <li>• <a href="#">Annual Governance Statement</a></li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	<p>Striving to optimise the use of the full powers available for the benefit of citizens, communities and other stakeholders</p> <p>Dealing with breaches of legal and regulatory provisions effectively</p> <p>Ensuring corruption and misuse of power are dealt with effectively</p>	<p>the requirements of general law, and in particular integrate the key principles of administrative law – rationality, legality and natural justice into the procedures and decision making.</p> <p>Have put in place effective systems to protect the rights of staff. We ensure that policies for whistleblowing which are accessible to staff and those contracting with the Council, and arrangements for the support of whistle blowers, are in place.</p> <p>Publish an Annual Governance Statement, signed by the Leader and the Chief Executive, and reviewed through the Audit Committee to review the effectiveness of the Council's governance framework</p>	<ul style="list-style-type: none"> <li>• <a href="#">External inspections of accounts</a></li> <li>• <a href="#">Internal Audit Annual Plan</a></li> <li>• <a href="#">Assurance Framework supporting the Annual Governance Statement</a></li> <li>• <a href="#">Equal Opportunities Policy</a></li> <li>• <a href="#">Registers of Gifts and Hospitality</a></li> <li>• <a href="#">Legal (Monitoring Officer) Role</a></li> <li>• <a href="#">Corporate Complaints Procedure</a></li> <li>• <a href="#">MCC Committee (supporting Members' observation of their Code of Conduct)</a></li> <li>• <a href="#">Overview and Scrutiny functions</a></li> </ul>

## Principle B - Ensuring openness and comprehensive stakeholder engagement.

### Summary:

Local government is run for the public good; organisations therefore should ensure openness in their activities. Clear, trusted channels of communication and consultation should be used to engage effectively with all groups of stakeholders, such as individual citizens and service users, as well as institutional stakeholders.

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
<b>Openness</b>	<p>Ensuring an open culture through demonstrating, documenting and communicating the organisation's commitment to openness</p> <p>Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case, a justification for the reasoning for keeping a decision confidential should be provided</p> <p>Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear</p> <p>Using formal and informal consultation and engagement to determine the most</p>	<p>Ensure that the Council's priorities within the Corporate Plan and targets are developed in consultation with the local community and other key stakeholders, and that they are clearly articulated and disseminated.</p> <p>Maintain a culture of accountability so that Members and Officers understand to whom they are accountable and for what.</p> <p>Strive to engage with stakeholders on an individual and collective basis to demonstrate that we deliver services and outcomes that meet the needs and expectations of the public. These arrangements will recognise that different sections of the community have different priorities and establish robust processes for dealing with these competing demands.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Corporate Plan</a></li> <li>• <a href="#">Consultation strategy</a></li> <li>• <a href="#">Constitution</a></li> <li>• <a href="#">Scheme of Delegation to officers</a></li> <li>• <a href="#">Budget reports</a></li> <li>• <a href="#">Corporate Risk Register and risks identified in committee reports</a></li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	appropriate and effective interventions/courses of action		
<b>Engaging comprehensively with institutional stakeholders</b>	<p>NB institutional stakeholders are the other organisations that local government needs to work with to improve services and outcomes (such as commercial partners and suppliers as well as other public or third sector organisations) or organisations to which they are accountable.</p> <p>Effectively engaging with institutional stakeholders to ensure that the purpose, objectives and intended outcomes for each stakeholder relationship are clear so that outcomes are achieved successfully and sustainably</p> <p>Developing formal and informal partnerships to allow for resources to be used more efficiently and outcomes achieved more effectively</p> <p>Ensuring that partnerships are based on trust, a shared commitment to change and a culture that promotes and accepts challenge among partners and that the added value of partnership working is explicit</p>	<p>Publish reports giving information on the Council's strategies, plans and financial statements as well as information about outcomes, achievements.</p> <p>Ensure that the Council as a whole is open and accessible to the community, service users and staff and we are committed to openness and transparency in all dealings.</p> <p>Publish all committee reports under Part 1 – open for inspection the public - unless there is a legitimate need to preserve confidentiality on the basis of the statutory tests.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Statement of Accounts</a></li> <li>• <a href="#">Cabinet Forward Plan</a></li> <li>• <a href="#">Council Website</a></li> <li>• <a href="#">Formal consultation arrangements and staff surveys</a></li> <li>• Community and voluntary sector representation on Partnership Boards</li> <li>• Freedom of Information publication scheme</li> <li>• Overview and Scrutiny functions</li> <li>• <a href="#">Community Safety</a></li> <li>• External Auditor provides an annual organisational assessment of the Council's performance through the Value for Money conclusion</li> </ul>
<b>Engaging stakeholders effectively,</b>	Establishing a clear policy on the type of issues that the organisation will meaningfully consult with or involve	As above	As above

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
<p><b>including individual citizens and service users</b></p>	<p>communities, individual citizens, service users and other stakeholders to ensure that service (or other) provision is contributing towards the achievement of intended outcomes</p> <p>Ensuring that communication methods are effective and that members and officers are clear about their roles with regard to community engagement</p> <p>Encouraging, collecting and evaluating the views and experiences of communities, citizens, service users and organisations of different backgrounds including reference to future needs</p> <p>Implementing effective feedback mechanisms in order to demonstrate how views have been taken into account</p> <p>Balancing feedback from more active stakeholder groups with other stakeholder groups to ensure inclusivity</p> <p>Taking account of the impact of decisions on future generations of tax payers and service users</p>		



## Principle C - Defining outcomes in terms of sustainable economic, social, and environmental benefits.

### Summary:

The long-term nature and impact of many of local government's responsibilities mean that it should define and plan outcomes and that these should be sustainable. Decisions should further the authority's purpose, contribute to intended benefits and outcomes, and remain within the limits of authority and resources. Input from all groups of stakeholders, including citizens, service users, and institutional stakeholders, is vital to the success of this process and in balancing competing demands when determining priorities for the finite resources available.

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
Defining outcomes	<p>Having a clear vision, which is an agreed formal statement of the organisation's purpose and intended outcomes containing appropriate performance indicators, which provide the basis for the organisation's overall strategy, planning and other decisions</p> <p>Specifying the intended impact on, or changes for, stakeholders including citizens and service users. It could be immediately or over the course of a year or longer</p> <p>Delivering defined outcomes on a sustainable basis within the resources that will be available</p> <p>Identifying and managing risks to the achievement of outcomes</p> <p>Managing service users' expectations effectively with regard to determining priorities and making</p>	<p>Make a clear statement of the Council's purpose and use it as a basis for corporate and service planning.</p> <p>Publish annual reports to communicate the Council's activities and achievements, its financial position and performance.</p> <p>Ensure that those making decisions are provided with financial and non-financial information that is fit for the purpose relevant, timely and gives clear explanations of technical issues and their implications.</p> <p>Identify and monitor service performance indicators which demonstrate how the quality of service for users is to be measured.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Corporate Plan</a></li> <li>• <a href="#">Budget Reports</a></li> <li>• <a href="#">Audit Reports</a></li> <li>• <a href="#">Statement of Accounts</a></li> <li>• <a href="#">External Auditors letter &amp; reports</a></li> <li>• <a href="#">External Audit Inspections</a></li> <li>• <a href="#">Performance management framework</a></li> <li>• <a href="#">Project Management arrangements</a></li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	the best use of the resources available Sustainable economic, social and environmental benefits		
<b>Defining sustainable economic, social and environmental benefits</b>	<p>Considering and balancing the combined economic, social and environmental impact of policies and plans when taking decisions about service provision</p> <p>Taking a longer-term view with regard to decision making, taking account of risk and acting transparently where there are potential conflicts between the organisation's intended outcomes and short-term factors such as the political cycle or financial constraints</p> <p>Determining the wider public interest associated with balancing conflicting interests between achieving the various economic, social and environmental benefits, through consultation where possible, in order to ensure appropriate trade-offs</p> <p>Ensuring fair access to services</p>	<p>Maintain a prudential financial framework, balance commitments with available resources; and monitor income and expenditure levels to ensure this balance is achieved.</p> <p>Ensure compliance with the CIPFA codes regarding a Prudential Framework for Capital Finance and Treasury Management.</p>	<ul style="list-style-type: none"> <li>• Project Management arrangements</li> <li>• Treasury Management strategy</li> <li>• Regular budget reporting</li> <li>• Internal and external audit</li> </ul>

## Principle D - Determining the interventions necessary to optimise the achievement of the intended outcomes.

### Summary:

Local government achieves its intended outcomes by providing a mixture of legal, regulatory, and practical interventions. Determining the right mix of these courses of action is a critically important strategic choice that local government has to make to ensure intended outcomes are achieved. They need robust decision-making mechanisms to ensure that their defined outcomes can be achieved in a way that provides the best trade-off between the various types of resource inputs while still enabling effective and efficient operations. Decisions made need to be reviewed continually to ensure that achievement of outcomes is optimised.

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
<b>Determining interventions</b>	<p>Ensuring decision makers receive objective and rigorous analysis of a variety of options indicating how intended outcomes would be achieved and associated risks. Therefore ensuring best value is achieved however services are provided</p> <p>Considering feedback from citizens and service users when making decisions about service improvements or where services are no longer required in order to prioritise competing demands within limited resources available including people, skills, land and assets and bearing in mind future impacts</p>	<p>Make a clear statement of the Council's purpose and use it as a basis for corporate and service planning.</p> <p>Clear process for decision making.</p> <p>Have risk management arrangements in place including mitigating actions to support the achievement of the Council's intended outcomes.</p> <p>Ensure that there are effective arrangements in place to monitor service delivery.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Corporate Plan</a></li> <li>• <a href="#">Risk Management Framework</a></li> <li>• Service Plans</li> <li>• <a href="#">Service Risk Registers</a></li> <li>• Performance Management Reports to Committees and to the Leadership Team</li> <li>• Business Continuity Plans</li> </ul>
<b>Planning interventions</b>	Establishing and implementing robust planning and control cycles	Put in place effective arrangements to deal with a failure in service delivery and explore	<ul style="list-style-type: none"> <li>• Emergency &amp; Resilience Plans</li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	<p>that cover strategic and operational plans, priorities and targets</p> <p>Engaging with internal and external stakeholders in determining how services and other courses of action should be planned and delivered</p> <p>Considering and monitoring risks facing each partner when working collaboratively, including shared risks</p> <p>Ensuring arrangements are flexible and agile so that the mechanisms for delivering goods and services can be adapted to changing circumstances</p> <p>Establishing appropriate key performance indicators (KPIs) as part of the planning process in order to identify how the performance of services and projects is to be measured</p> <p>Ensuring capacity exists to generate the information required to review service quality regularly</p> <p>Preparing budgets in accordance with objectives, strategies and the medium term financial plan</p> <p>Informing medium and long term resource planning by drawing up realistic estimates of revenue and</p>	<p>options for improving service delivery and outcomes for our residents.</p> <p>Have prepared contingency arrangements including disaster recovery plans and business continuity plans to ensure resilience in delivering services, for example during adverse weather conditions.</p> <p>Provide senior managers and Members with timely financial and performance information.</p> <p>Ensure that budget calculations are robust.</p> <p>Align financial and performance data to provide an overall understanding of performance.</p>	<ul style="list-style-type: none"> <li>• Feedback from consultation exercises</li> <li>• Monitoring of all KPI's and key projects.</li> <li>• Budget monitoring arrangements.</li> <li>• Project monitoring and action taken to support the implementation of key projects.</li> <li>• Process for committee approvals and delegated approval</li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	capital expenditure aimed at developing a sustainable funding strategy		
<b>Optimising achievement of intended outcomes</b>	<p>Ensuring the medium term financial strategy integrates and balances service priorities, affordability and other resource constraints</p> <p>Ensuring the budgeting process is all-inclusive, taking into account the full cost of operations over the medium and longer term</p> <p>Ensuring the medium term financial strategy sets the context for ongoing decisions on significant delivery issues or responses to changes in the external environment that may arise during the budgetary period in order for outcomes to be achieved while optimising resource usage</p> <p>Ensuring the achievement of 'social value' through service planning and commissioning</p>	As above	As above

## Principle E - Developing the Council's capacity, including the capability of its leadership and the individuals within it.

### Summary:

Local government needs appropriate structures and leadership, as well as people with the right skills, appropriate qualifications and mind-set, to operate efficiently and effectively and achieve their intended outcomes within the specified periods. A local government organisation must ensure that it has both the capacity to fulfil its own mandate and to make certain that there are policies in place to guarantee that its management has the operational capacity for the organisation as a whole. Because both individuals and the environment in which an authority operates will change over time, there will be a continuous need to develop its capacity as well as the skills and experience of the leadership of individual staff members. Leadership in local government entities is strengthened by the participation of people with many different types of backgrounds, reflecting the structure and diversity of communities.

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
<b>Developing the Council's capacity</b>	<p>Reviewing operations, performance and use of assets on a regular basis to ensure their continuing effectiveness</p> <p>Improving resource use through appropriate application of techniques such as benchmarking and other options in order to determine how resources are allocated so that defined outcomes are achieved effectively and efficiently</p> <p>Recognising the benefits of partnerships and collaborative working where added value can be achieved</p> <p>Developing and maintaining an effective workforce plan to enhance the strategic allocation of resources</p>	<p>Through the Constitution set out a clear statement of the respective roles and responsibilities of the Committees and individual Members.</p> <p>Set out a clear statement of the respective roles and responsibilities of the Council's senior officers.</p> <p>Have developed protocols to ensure effective communication between Council Members and officers in their respective roles.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Constitution</a></li> <li>• Annual Pay Policy Statement</li> <li>• Members' Allowance Scheme</li> <li>• Scheme of Delegation</li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
<p><b>Developing the capability of the Council's leadership and other individuals</b></p>	<p>Developing protocols to ensure that elected and appointed leaders negotiate with each other regarding their respective roles early on in the relationship and that a shared understanding of roles and objectives is maintained</p> <p>Publishing a statement that specifies the types of decisions that are delegated and those reserved for the collective decision making of the governing body</p> <p>Ensuring the leader and the chief executive have clearly defined and distinctive leadership roles within a structure whereby the chief executive leads in implementing strategy and managing the delivery of services and other outputs set by members and each provides a check and a balance for each other's authority</p> <p>Developing the capabilities of members and senior management to achieve effective leadership and to enable the organisation to respond successfully to changing legal and policy demands as well as economic, political and environmental changes and risks by:</p>	<p>Conduct for Elected Members are adhered to.</p> <p>Assess the skills required by Members including the understanding of financial systems.</p> <p>Assess the skills required by officers through the appraisal process and address any training gaps, to enable roles to be carried out effectively.</p> <p>Develop skills on a continuing basis to improve performance, including the ability to scrutinise and challenge and to recognise when outside expert advice is needed.</p> <p>Ensure that the statutory officers have the skills, resources and support necessary to perform effectively in their roles and that these roles are properly understood throughout the Council.</p> <p>Provide the Chief Finance Officer with the resources, expertise and systems necessary to perform the role effectively within the Council.</p> <p>Provide operational divisions with the resources, expertise and systems necessary to perform the role effectively within the Council.</p> <p>Monitor all key corporate projects</p>	<ul style="list-style-type: none"> <li>• Personal Development Plans</li> <li>• Appraisals</li> <li>• Member Induction &amp; Development Programme</li> <li>• ICT Digital Strategy</li> <li>• Organisational Development Plan?</li> <li>• Project management arrangements</li> <li>• Corporate Projects Register</li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	<p>— ensuring members and staff have access to appropriate induction tailored to their role and that ongoing training and development matching individual and organisational requirements is available and encouraged</p> <p>— ensuring members and officers have the appropriate skills, knowledge, resources and support to fulfil their roles and responsibilities and ensuring that they are able to update their knowledge on a continuing basis</p> <p>— ensuring personal, organisational and system-wide development through shared learning, including lessons learnt from governance weaknesses both internal and external</p> <p>Ensuring that there are structures in place to encourage public participation</p> <p>Taking steps to consider the leadership's own effectiveness and ensuring leaders are open to constructive feedback from peer review and inspections</p> <p>Holding staff to account through regular performance reviews which</p>		



Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	<p>take account of training or development needs</p> <p>Ensuring arrangements are in place to maintain the health and wellbeing of the workforce and support individuals in maintaining their own physical and mental wellbeing</p>		

## Principle F - Managing risks and performance through robust internal control and strong public financial management.

### Summary:

Local government needs to ensure that the organisations and governance structures that it oversees have implemented, and can sustain, an effective performance management system that facilitates effective and efficient delivery of planned services. Risk management and internal control are important and integral parts of a performance management system and crucial to the achievement of outcomes. Risk should be considered and addressed as part of all decision making activities. A strong system of financial management is essential for the implementation of policies and the achievement of intended outcomes, as it will enforce financial discipline, strategic allocation of resources, efficient service delivery, and accountability. It is also essential that a culture and structure for scrutiny is in place as a key part of decision making, policy making and review. A positive working culture that accepts, promotes and encourages constructive challenge is critical to successful scrutiny and successful delivery.

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
<b>Managing risk</b>	<p>Recognising that risk management is an integral part of all activities and must be considered in all aspects of decision making</p> <p>Implementing robust and integrated risk management arrangements and ensuring that they are working effectively</p> <p>Ensuring that responsibilities for managing individual risks are clearly allocated</p>	<p>Maintain an effective Audit Committee which is independent of the executive and scrutiny functions.</p> <p>Ensure that risk management is embedded into the culture of the Council, with Members and managers at all levels recognising that risk management is part of their job.</p>	<ul style="list-style-type: none"> <li>• Risk Management Strategy</li> <li>• Regular Corporate Risk Management Reports</li> <li>• Service Risk Registers</li> <li>• Budget Reports</li> </ul>
<b>Managing performance</b>	<p>Monitoring service delivery effectively including planning, specification, execution and independent post implementation review</p> <p>Making decisions based on relevant, clear objective analysis and advice</p>	<p>Ensure our arrangements for financial and internal control and management of risk are formally addressed within the annual governance statement.</p>	<ul style="list-style-type: none"> <li>• Annual Governance Report</li> <li>• Performance Management Framework and</li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	<p>pointing out the implications and risks inherent in the organisation's financial, social and environmental position and outlook</p> <p>Ensuring an effective scrutiny or oversight function is in place which provides constructive challenge and debate on policies and objectives before, during and after decisions are made thereby enhancing the organisation's performance and that of any organisation for which it is responsible</p> <p>Encouraging effective and constructive challenge and debate on policies and objectives to support balanced and effective decision making</p>		reporting cycle to all Committees
<b>Robust internal control</b>	<p>Providing members and senior management with regular reports on service delivery plans and on progress towards outcome achievement</p> <p>Ensuring there is consistency between specification</p> <p>Aligning the risk management strategy and policies on internal control with achieving objectives</p>	<p>Ensure effective internal control arrangements exist for sound financial management systems and processes.</p> <p>Ensure that there is a performance management framework and performance is reported to relevant committee for improvement.</p>	<ul style="list-style-type: none"> <li>• Internal Auditing standards</li> <li>• Annual Audit Plan</li> <li>• Internal Audit Reports</li> <li>• Internal Audit Manager's annual opinion of assurance</li> <li>• Corporate Projects Register</li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	<p>Evaluating and monitoring risk management and internal control on a regular basis</p> <p>Ensuring effective counter fraud and anti-corruption arrangements are in place</p> <p>Ensuring additional assurance on the overall adequacy and effectiveness of the framework of governance, risk management and control is provided by the internal auditor</p> <p>Ensuring an audit committee or equivalent group/function, which is independent of the executive and accountable to the governing body:</p> <ul style="list-style-type: none"> <li>— provides a further source of effective assurance regarding arrangements for managing risk and maintaining an effective control environment</li> <li>— that its recommendations are listened to and acted upon</li> </ul>		<ul style="list-style-type: none"> <li>• Medium Term Financial Strategy.</li> <li>• Budget targets and monitoring reports to Committee</li> </ul>
<b>Managing data</b>	Ensuring effective arrangements are in place for the safe collection, storage, use and sharing of data, including processes to safeguard personal data	Effective arrangements are in place for the safe collection, storage and sharing of data including processes to safeguard personal data.	<ul style="list-style-type: none"> <li>• IT Security &amp; Acceptable Use Policy</li> <li>• Data Protection Policies</li> <li>• Retention and Disposal Policies</li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	<p>Ensuring effective arrangements are in place and operating effectively when sharing data with other bodies</p> <p>Reviewing and auditing regularly the quality and accuracy of data used in decision making and performance monitoring</p>		
<b>Strong public financial management</b>	<p>Ensuring financial management supports both long term achievement of outcomes and short-term financial and operational performance</p> <p>Ensuring well-developed financial management is integrated at all levels of planning and control, including management of financial risks and controls</p>	<p>Enable the Chief Finance Officer can bring influence to bear on all material decisions and provide advice on the levels of reserves and balances to be retained.</p>	<ul style="list-style-type: none"> <li>• Annual Budget Speech</li> </ul>

## Principle G - Implementing good practices in transparency, reporting, and audit to deliver effective accountability.

### Summary:

Accountability is about ensuring that those making decisions and delivering services are answerable for them. Effective accountability is concerned not only with reporting on actions completed, but also ensuring that stakeholders are able to understand and respond as the organisation plans and carries out its activities in a transparent manner. Both external and internal audit contribute to effective accountability.

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
<b>Implementing good practice in transparency</b>	<p>Writing and communicating reports for the public and other stakeholders in a fair, balanced and understandable style appropriate to the intended audience and ensuring that they are easy to access and interrogate</p> <p>Striking a balance between providing the right amount of information to satisfy transparency demands and enhance public scrutiny while not being too onerous to provide and for users to understand</p>	Comply with the local government transparency code and publish all required information in a timely manner.	<ul style="list-style-type: none"> <li>Council's Committee Wepages</li> </ul>
<b>Implementing good practices in reporting</b>	<p>Reporting at least annually on performance, value for money and stewardship of resources to stakeholders in a timely and understandable way</p> <p>Ensuring members and senior management own the results reported</p>	Have established a medium term financial planning process in order to deliver a financial strategy ensuring sustainable finances, a robust annual budget process ensuring financial balance and an adequate monitoring process; all of which are subject to regular review.	<ul style="list-style-type: none"> <li>Medium Term Financial Strategy</li> <li>Towards a Sustainable Future Strategy</li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	Ensuring robust arrangements for assessing the extent to which the principles contained in this Framework have been applied and publishing the results on this assessment, including an action plan for improvement and evidence to demonstrate good governance (the annual governance statement)		
<b>Assurance and effective accountability</b>	<p>Ensuring that this Framework is applied to jointly managed or shared service organisations as appropriate</p> <p>Ensuring the performance information that accompanies the financial statements is prepared on a consistent and timely basis and the statements allow for comparison with other, similar organisations</p> <p>Ensuring that recommendations for corrective action made by external audit are acted upon</p> <p>Ensuring an effective internal audit service with direct access to members is in place, providing assurance with regard to governance arrangements and that recommendations are acted upon</p>	<p>Put in place effective transparent and accessible arrangements for dealing with complaints.</p> <p>Maintain an effective scrutiny function which encourages constructive challenge and enhances the Council's performance overall.</p> <p>Maintain an effective Audit Committee.</p> <p>Ensure an effective internal audit function is resourced and maintained.</p> <p>Take corrective action from internal and external audit reports.</p> <p>Maintain open and effective mechanisms for documenting evidence for decisions and recording the criteria, rationale and considerations on which decisions are based.</p> <p>Publish all committee reports under Part 1 open to inspection by the public – unless there is a legitimate need to preserve</p>	<ul style="list-style-type: none"> <li>• <a href="#">Corporate Complaints Procedure</a></li> <li>• <a href="#">Audit Committee</a></li> <li>• <a href="#">Constitution</a></li> <li>• <a href="#">Mod.Gov</a></li> <li>• <a href="#">Whistle-blowing Policy</a></li> <li>• Monthly budget and quarterly monitoring Reports</li> <li>• Annual Pay Policy Statement</li> <li>• Compliance with Transparency Agenda</li> <li>• Partnership Risk Register</li> <li>• <a href="#">Internal audit plan and the monitoring of the implementation of audit recommendations</a></li> </ul>

Supporting Principles	Behaviours and actions that demonstrate good governance in practice	To meet the requirements of these Principles the Council will:	How this will be evidenced
	<p>Welcoming peer challenge, reviews and inspections from regulatory bodies and implementing recommendations</p> <p>Gaining assurance on risks associated with delivering services through third parties and that this is evidenced in the annual governance statement</p> <p>Ensuring that when working in partnership, arrangements for accountability are clear and the need for wider public accountability has been recognised and met</p>	<p>confidentiality on the basis of the statutory tests.</p> <p>Ensure when working in partnership, arrangements for accountability are clear and the need for wider accountability has been recognised and met.</p>	<p><a href="#">Head of internal audit's annual opinion of assurance</a></p>



**Cabinet****21 March 2018**

<b>Title</b>	Heathrow – response to first public consultation		
<b>Purpose of the report</b>	To make a decision		
<b>Report Author</b>	Heather Morgan, Group Head Regeneration and Growth		
<b>Cabinet Member/Lead</b>	Cllr Boughtflower Cllr Barnard Cllr Gething Cllr Rybinski	<b>Confidential</b>	No
<b>Corporate Priority</b>	Economic Development and Clean and Safe Environment		
<b>Recommendations</b>	<b>Cabinet to:</b> <b>Approve the main response to the consultation for submission</b> <b>Approve the response to the land use strategy for submission</b> <b>Endorse the list of requirements that the Borough are submitting to Heathrow</b>		
<b>Reason for Recommendation</b>	As the borough which is probably most heavily impacted by the proposed expanded airport, Cabinet needs to make sure that its views are fed into the consultation process. The Council needs to ensure it protects the quality of life of its residents, and makes Heathrow Airport Limited fully aware of the Council's requirements.		

**1. Key issues**

- 1.1 The Council reaffirmed its support in principle for a third runway at Heathrow at an extraordinary meeting of Council on 16 January 2014. Its formal decision was:
  - (a) that the Council continues to support a third *northwest* runway at Heathrow as the best location in the local and national economic interest and that
  - (b) the Council will work with all appropriate parties to bring forward and promote an appropriate third *northwest* runway proposal, and associated transport links, that best mitigates the environmental and other impacts, whilst seeking to secure the best outcome for local residents.
- 1.2 At that time, the prime consideration was to maintain of Heathrow Airport's 'hub' status. The Council agreed that a Heathrow Hub was critical to the strength of the UK aviation industry and in turn the number of international

businesses who choose to locate near the airport. Failure to maintain this 'hub' status through expansion at Gatwick instead of Heathrow risked enormous damage to the UK economy.

- 1.3 It was also accepted that the scale of Heathrow exerts significant economic influence over the wider area providing both direct and indirect employment and a large number of supporting businesses. Heathrow provides significant economic benefits to the Borough including being the location where some 6.9% of all those in work in the Borough are employed (which rises to 25.3% in the ward of Stanwell North).

#### Airports Commission/Secretary of State for Transport position

- 1.4 The Airports Commission report was issued in the autumn of 2015 and concluded that the north-west runway was the preferred option. Heathrow Airport Limited (HAL) have agreed to meet or exceed the significant package of measures identified by the Airports Commission:
- Ban on scheduled night flights for 6.5 hours between 11pm and 7am
  - Establish plans for a clear, legally binding noise envelope
  - Predictable periods of respite when no planes will fly over homes
  - Compensation for those who would lose their homes
  - Over £1bn on community compensation (noise and property) and introduce a scheme to ensure airport users pay to compensate local communities for the impacts of the airport
  - Independent Community Engagement Board to influence on how money is spent on compensation and community support
  - Back an independent aviation noise authority with statutory powers
  - 5,000 additional apprenticeships, bringing the total to 10,000 by 2030
  - Incentivise and support a shift in transport modes for those working at and travelling through the airport
  - New capacity will only be released when it is clear that the airport's contribution will not delay the UK's compliance with EU air quality limits
  - Accept a commitment from Government ruling out a fourth runway
- 1.5 The Secretary of State for Transport set his key expectations for expansion at Heathrow which are:
1. Expansion is deliverable within air quality limits.
  2. Fewer local people will be affected by aircraft noise with expansion than today.
  3. There will be a package of compensation measures for those most affected by expansion.
  4. It will lower passenger fares relative to no expansion.
  5. It will benefit the whole of the UK

#### Spelthorne Borough Council position

- 1.6 Spelthorne Council acknowledges the case for a third runway at Heathrow Airport, and has been supportive of expansion proposals to date. We recognise the need for Heathrow Airport to maintain its 'hub' status. This is

critical to the strength of the UK aviation industry and in turn the number of international businesses who choose to locate near the airport. However, as a Council we need to hold HAL to account and ensure that they meet their own stated commitments and the Secretary of States key expectations.

- 1.7 Airport expansion brings with it huge challenges in terms of its impact on communities (noise, traffic, and air quality), the environment (loss of open space and habitat), infrastructure and local road networks. Spelthorne's support for Heathrow has always been entirely dependent on ensuring that any scheme coming forward comprehensively and effectively mitigates against all impacts, and provides lasting benefits for the local community. Mitigation measures must be integrated seamlessly into any scheme – they must not be an 'add on'.
- 1.8 Spelthorne's primary duty of care must always be to protect our borough and secure the best possible outcomes we can for our residents and businesses. In relation to Heathrow we must have particular regard to those most directly affected in the Stanwell Moor and Stanwell communities.
- 1.9 HAL will be expected by the Council to give full and detailed consideration to the legacy of this large scale infrastructure project, and bring future benefits to those existing communities who have already endured development on a significant scale. There has to be a lasting benefit for Stanwell Moor and Stanwell. These are set out in the List of Requirements referred to below.
- 1.10 The consultation documents do not provide any baseline data from which the Council can fully assess the impacts of all the proposed changes. The Council will expect HAL to provide a comprehensive suite of baseline data documents on issues including noise, traffic and air quality. Without this, local communities cannot have any real degree of confidence around the level to which they will be adversely affected (or not).
- 1.11 Many of the documents contain in-exact wording and the prevalence of the word "may" which is not helpful in understanding the concrete effects of the proposals. It is also clear that whilst a number of options which have been forward are technically feasible (e.g., some options for the Stanwell Moor junction) they are clearly either so expensive or impact so significantly on local communities that they are not a realistic option.
- 1.12 The consultation acknowledges that it does not deal with a number of issues which will impact on the borough of Spelthorne: Flight paths, runway modes, baggage, park and ride, public transport interchange, landscape mitigation, temporary construction and displaced uses. This is a concern as it does not set out the true picture in terms of the potential impact on the borough.
- 1.13 As a result of the dearth of technical information, the Council will have to reserve its final position at this stage on critical issues affecting our community such as traffic, noise and air quality.

## 2. Options analysis and proposal

- 2.1 Cabinet can decide not to respond to the consultation. This is not recommended as we would not be able to put forward our views and concerns in relation to the significant impacts that the expanded airport will have on our communities. Nor would the Council be able to set out its position in terms of mitigation and enhancements for those communities.
- 2.2 There are a suite of documents that Cabinet is being asked to approve. The first document is an Executive Summary (**Appendix 1**) setting out the Council's overall view and highlighting our key messages. The second is the Council's response to the main consultations being carried out on the Expansion and Airspace Change (**Appendix 2**). As part of this, we will be submitting plans for an extended Wider Property Offer Zone and a Controlled Parking Zone which are essential to protect our residents.
- 2.3 The third document is the Council's response to the land use strategy (e.g. where possible airport related uses such as hotels, offices, car parks, cargo and immigration removal centres might be located) (**Appendix 3**).

### Council's List of Requirements

- 2.4 Cabinet is also specifically being asked to endorse a List of Requirements that will be submitted to Heathrow Airport Limited, which in the view of the Council are essential to best protect and enhance the future lives of residents in Stanwell Moor and Stanwell with a neighbouring and expanded airport.
1. **Expanded Wider Property Offer Zone** - To cover the whole of Stanwell Moor and large parts of Stanwell (as outlined in **Appendix 4**)
  2. **Parking controls** –
    - i) A Controlled Parking Zone (CPZ) to be set up for Stanwell Moor and large parts of Stanwell with capital and revenue costs to be met by HAL (as outlined in **Appendix 5**)
    - ii) Provision of suitable on-airport facilities to accommodate all taxis and private hire vehicles
  3. **Community legacy benefits** – Provision of an enhanced multi-purpose community hall for Stanwell Moor, and Stanwell Village and provision of a new leisure facility in the locality, provision of perimeter paths for open spaces in Stanwell Moor and Stanwell, improvements to leisure facilities at Long Lane Recreation Ground and Stanwell Moor Recreation Ground, fishing facilities, 3G pitches, with capital and revenue costs to be met by HAL. These should be provided in advance of any development work.
  4. **No Immigration Removal Centres** in the Borough. A development for this purpose would require a functional design with high-level security features and extensive hardstanding. In view of the very considerable effect this would have on the Stanwell Moor community, we contend that this is a totally unacceptable use of the site and object in the strongest possible terms to its relocation here.
  5. **Surface access/public transport** -
    - i) Support and commit to help fund the capital cost of implementing Southern Light Rail proposal to improve existing infrastructure, enhancing connectivity for the airport whilst integrating with the heavy rail network to the south).

- ii) Introduction of regular and quick bus routes into Heathrow to enable local residents to access jobs at the expanded airport with HAL paying capital and revenue costs.
  - iii) Full support from HAL for Spelthorne to be included within the London Transport Oyster Card Zone 6 operating area.
  - iv) Minimising unnecessary vehicle movements – e.g. provision of pod/shuttle link between the proposed cargo hub north and south of the Southern Perimeter Road
  - v) Development of a Construction Environmental Management Plan covering traffic management (including designated routes for HGVs), site management, accommodation for workers and effective communications to minimise effects on local residents.  
 HAL to pay Council for any enforcement that has be to undertaken where sub-contractors do not comply with the Management Plan or do not get relevant permissions.
6. **Air quality** - Air quality must be no worse for our residents than it is now but our preference is that there are measures to ensure continuous improvement in the local air quality experienced by residents.
  7. **Noise** - Spelthorne would expect that the development of the noise envelope would secure continuous improvement in the noise environment experienced by residents
  8. **Night flights should be banned** – Not only should night flights be banned, strict penalties must be imposed for any breaches and all the monies must be put back into the communities affected. Whilst Spelthorne supports reducing the number of people overflowed by aircraft, insufficient information has been provided to enable us to make an informed decision. Spelthorne would expect that residents receive their full share of the benefits of quieter aircraft/airport technology and systems.
  9. **Borough Boundary** - No loss of sovereignty by altering the borough-boundary with an expanded airport
  10. **Staines Moor** - Whilst the land could be better managed in order to safeguard the site in perpetuity, it is not considered suitable for enhancement and is best left undisturbed. Work on redirecting the River Colne must not alter the flow or character of the river on the moor.
3. **Financial implications**
    - 3.1 There are no financial implications at this stage. However Cabinet need to be aware that as the scheme moves forward the Council will need to engage experts to advise us in certain areas such as noise and transport.
  4. **Other considerations**
    - 4.1 There are none.
  5. **Timetable for implementation**
    - 5.1 The deadline for responses is 28 March 2018. HAL will undertake a second consultation at the end of this year (date to be determined) where they will consult on their proposed Development Consent Order application. It is only

at this stage that they will provide Preliminary Environmental Information on the proposed application.

- 5.2 The draft Airports National Policy Statement (ANPS) went out to consultation in autumn 2017, and the Transport Select Committee has recently heard evidence on the matter. It is anticipated that the House of Commons will make a decision on the matter before the summer recess. If approved by the House of Commons the ANPS will then go to the Secretary of State for Transport for designation. If this point is reached, the government will effectively be confirming their support for the NW runway at Heathrow.

**Appendices:**

- 1 Executive Summary
- 2 Response to main consultation
- 3 Response to land use strategy
- 4 Map of Wider Property Offer Zone
- 5 Map of Controlled Parking Zone
- 6 Map of other sites to be included for consideration

## **Spelthorne Borough Council's response to Heathrow Consultation**

### **Executive summary**

Spelthorne Borough Council recognise the importance of Heathrow's 'hub' status to the UK economy, acknowledge the case for a third runway and reiterate our support, in principle, for Heathrow expansion because of the potential benefits to and opportunities for the local area.

However the Council's support has always been entirely dependent on Heathrow Airport Limited (HAL) ensuring that any scheme comprehensively and effectively mitigates against impacts on noise, traffic, air quality, the wider environment, infrastructure and local road networks.

Spelthorne's primary aim must always be to secure the best possible outcomes for our residents and businesses, in particular those most directly affected in the Stanwell Moor and Stanwell communities. We do not believe that HAL has fully considered the overall cumulative impact of the expanded airport on those communities. Expansion on the scale proposed will bring airport-related development far closer to people's homes and families, changing these villages forever.

Residents need reassurance that HAL will fully meet any pledges made to minimise the impacts of whatever scheme is taken forward.

The consultation documents are short on detail: they do not provide any baseline data from which Spelthorne can fully assess the impacts of all the proposed changes. Neither does the consultation touch on important issues such as flight paths which will be crucial to assessing the wider impacts expansion will have on our borough. The Council must therefore reserve its final position on critical issues affecting our communities.

Based on the information available at this stage of the consultation process, Spelthorne has a list of ten requirements:

1. The Wider Property Offer Zone (WPOZ) must be expanded to cover the whole of Stanwell Moor and large parts of Stanwell
2. Parking controls in Stanwell Moor and large parts of Stanwell and an on-airport taxi/private hire facility (with HAL to cover the full costs)
3. HAL to provide an enhanced multi-purpose community hall for Stanwell Moor and Stanwell Village and a new leisure facility in the locality (plus 3G pitches), improved facilities in local recreation grounds (outdoor gyms), perimeter paths round open spaces and fishing facilities. These need to be provided in advance of any development work.
4. No Immigration Removal Centres in the borough.
5. Surface access/public transport -
  - i) Support and commit to help fund the capital cost of implementing Spelthorne's Southern Light Rail proposal to improve existing infrastructure, enhance connectivity for the airport whilst integrating with the heavy rail network to the south.

- ii) Introduce regular and quick bus routes into Heathrow to enable local residents to access jobs at the expanded airport
  - iii) Full support for Spelthorne to be included within the London Transport Oyster Card Zone 6 operating area.
  - iv) Minimise unnecessary vehicle movements for example by providing a pod/shuttle link between the proposed cargo hub north and south of the Southern Perimeter Road
  - v) Develop a Construction Environmental Management Plan covering traffic management (including designated routes for HGVs), site management, accommodation for workers and effective communications to minimise effects on local residents. HAL to pay Council for any enforcement that has to be undertaken where sub-contractors do not comply with the Management Plan or do not get relevant permissions.
6. Air quality must be no worse for our residents than it is now and we would expect there to be measures in place to ensure continuous improvement in the local air quality experienced by residents.
  7. Spelthorne would expect there to be continuous improvement in the noise experienced by residents.
  8. Night flights should be banned and strict penalties must be imposed for any breaches, with all the monies put back into the affected communities. Whilst Spelthorne supports reducing the number of people overflowed by aircraft, more information is needed about what this means for residents for us to make an informed decision.
  9. No changes to the borough boundary
  10. Staines Moor is an important Site of Special Scientific Interest (SSSI) and should remain undisturbed. Work on redirecting the River Colne must not alter the flow or character of the river on the Moor.



## HEATHROW CONSULTATION

### 1a. Please tell us what you think about Heathrow's plans to expand the airport.

Spelthorne Council acknowledges the case for a third runway at Heathrow Airport, and has supported the expansion proposals to date. We recognise the need for Heathrow Airport to maintain its 'hub' status. This is critical to the strength of the UK aviation industry and in turn the number of international businesses who choose to locate near the airport. As a Council we recognise that there are significant employment opportunities for our local community, both from the airport itself and its supply chain – 6.9% of the borough's population work at the airport (which rises to 25.4% in the ward of Stanwell North). We also acknowledge the opportunities that the growth of Heathrow will bring economically to the wider area. **We want an expanded Heathrow to be both successful and sustainable.**

However, Airport expansion brings with it huge challenges in terms of its impact on communities (noise, traffic, and air quality), the environment (loss of open space and habitat), infrastructure and local road networks. Spelthorne's support for Heathrow has always been entirely dependent on ensuring that any scheme coming forward comprehensively and effectively mitigates against all impacts, and provides lasting benefits for the local community. Mitigation measures must be integrated seamlessly into any scheme – they must not be an 'add on'.

Spelthorne's primary duty of care must always be to protect our borough and secure the best possible outcomes we can for our residents and businesses. In relation to Heathrow we must have particular regard to those most directly affected in the Stanwell Moor and Stanwell communities.

Whilst Heathrow Airport Limited (HAL) has considered the impacts of individual sites on adjoining residents, it has not given sufficient weight to, or fully considered, the overall cumulative impact of the expanded airport on local communities in Spelthorne. It cannot simply be a question of recompensing those who immediately adjoin a site, (although as it stands HAL do not consider that any residents in Stanwell Moor and Stanwell who adjoin these sites are sufficiently impacted to even merit inclusion in the Wider Property Offer Zone). Many residents of Stanwell Moor and Stanwell have lived in their respective communities for generations, when the airport was still in its infancy. Heathrow has fundamentally affected their quality of life. They have had to cope with the daily noise, air quality and traffic issues from an ever expanding airport but have not seen the level of investment and commitment from HAL that many consider should have been provided. They feel 'forgotten' and beleaguered.

Expansion on the scale proposed will bring airport related development far closer to their homes and families. It will change the geography of these villages forever, and impact on these close knit communities. Stanwell Moor in particular would effectively become 'hemmed in' by development and residents will feel even more isolated than at present.

Many residents of the area do not believe that HAL has delivered on its previous pledges, (e.g. no more development after Terminal 5), and they are therefore rightly demanding

cast iron assurances that HAL will, this time, fully mitigate the impacts of any future expansion and agree not to expand with a fourth runway in the future.

As a Council, Spelthorne fully supports these local communities in trying to get the best outcomes we can from any planned expansion of Heathrow.

#### General comments on the Consultation

The consultation documents do not provide any baseline data which the Council can interrogate in order to fully assess the impacts of all the proposed changes. The Council will expect HAL to provide a comprehensive suite of baseline data on issues including noise, traffic and air quality. Without this, local communities cannot have any real degree of confidence around the level to which they will be adversely affected. Nor can the Council comment in any great detail on the broad sweep of key issues affecting our residents.

Many of the documents contain imprecise wording which is not helpful in understanding the concrete effects of the proposals. Whilst a number of options put forward are technically feasible (e.g. some options for the Stanwell Moor junction) they are clearly either so expensive or impact so significantly on local communities that they cannot be a realistic option. This makes it even more difficult for local residents to understand and respond to the documents.

The consultation documentation acknowledges that it does not deal with a number of issues which will impact on the borough of Spelthorne, including: flight paths, runway modes, baggage, park and ride, public transport interchanges, landscape mitigation, temporary construction and displaced uses. This is a real concern as it does not set out the true picture in terms of the potential impact on the borough. Of particular concern are the flight paths. It is entirely feasible that parts of our borough which are not currently impacted will be affected in the future. Until we have the details, we have no real way of assessing the wider impacts on the whole of the borough.

It is also evident that very limited consideration has been given to the issue of accommodating the construction workforce. In the view of the Council this needs to be properly planned and not done in an ad hoc way (as was done for T5). HAL need to commit to providing housing around the airport for all the boroughs who will be directly impacted to accommodation those workers, and for this housing to then be 'gifted' to those Councils for key worker accommodation/affordable housing in perpetuity after the completion of the third runway.

As a result of the dearth of technical information, the Council will have to reserve its final position on critical issues affecting our community such as traffic, noise and air quality.

#### **Council List of Requirements**

Spelthorne has a number of requirements which can be summarised under the following headings:

##### **1. Expanded Wider Property Offer Zone (WPOZ)**

The extent of the Wider Property Offer Zone (WPOZ) must be significantly expanded (see response to question 5a for more detail). Stanwell Moor and Stanwell will be significantly

affected by the expanded airport and residents must be afforded the same opportunity as those to the north and west of the airport as they are equally, if not significantly more, impacted. As it stands, residents who may end up living near to a new multi-storey car park containing thousands of cars, a new cargo hub or a new hotel/office development are not being given the opportunity to sell their homes to Heathrow under the WPOZ scheme. The same applies to those who will be impacted by increased traffic, poorer air quality and increased noise. This is an untenable situation which needs to be rectified.

## 2. Parking controls

One of the major impacts of the proposals would be that traffic movements around the airport would move from the north and east to south and west of the airport. This will result in significantly more traffic along local roads in the northern half of our borough. There is a real prospect that those who do not want to use the airport car parks will try to park on local roads. This would impact several thousand residents who are not directly affected by Heathrow at present. HAL need to make a firm commitment to paying for the introduction of a Controlled Parking Zone across Stanwell Moor and Stanwell to ensure those residents are not any worse off than they are now. HAL should pay for the administration of this in perpetuity (e.g. residents should not have to pay a fee for their annual permit). This needs to be in place before any pre-construction or development work starts.

HAL must also plan now for an integrated solution within the expanded airport boundary to accommodate hackney and private hire vehicles. HAL is aware that there has been a significant problem with the indiscriminate parking of these vehicles in Stanwell Moor and Stanwell, whilst they are awaiting airport pick-ups. This has caused anti-social behaviour and has prevented some residents from parking near their homes. HAL must ensure that suitable facilities are available within the expanded airport boundary to accommodate the needs of taxi and private hire vehicles awaiting airport pick-ups/fares.

## 3. Community legacy benefits

From a land use strategy perspective, it is clear that the proposals will have a very significant impact on our communities in Stanwell Moor and Stanwell. Our support for these proposals will be entirely dependent on securing significant benefits for our residents. These will be expanded upon in our responses on individual sites.

We would expect HAL to fully mitigate and compensate for the disruption, loss of open space, additional traffic, air quality and noise impacts, removal of community buildings and general effect on our residents' quality of life.

We firmly believe that lessons must be learned and applied from the Olympic Village principles, whereby full consideration is given to the legacy of a large-scale project, in order to deliver future benefits to local communities who have endured development on a significant scale. It is not a case of simply mitigating the impact - there should be lasting benefits accruing from an infrastructure project on this scale.

**Community facilities** - Mitigation cannot be limited to 'piecemeal' improvements around the edges of sites. It needs to make a real and meaningful difference to those families and communities directly affected. The proposals would result in the loss of community facilities, such as the Stanwell Moor Village Hall, and recreational open spaces. Any community facilities which need relocating must be enhanced and improved as part of the expansion plans at HAL's cost. This would include providing an enhanced multi-purpose community hall for Stanwell Moor, and Stanwell Village and provision of a new leisure facility in the locality, including 3G pitches, with capital and revenue costs to be met by

HAL. The Council has already commissioned a piece of work to determine the high level requirements for leisure facilities in these areas and these will be submitted to HAL for consideration in due course.

HAL need to provide a range of other facilities including perimeter paths around the open spaces in Stanwell Moor and Stanwell for buggy walks, disabled cycling, safe cycling for young children and beginners jogging, improvements to leisure facilities at Long Lane Recreation Ground and Stanwell Moor Recreation Ground (to include refurbishment of mini tennis courts, multi-use games area, play park, pavilion and outdoor gym/exercise equipment), fishing facilities and a base for Men in Sheds.

HAL should provide these in advance of any pre-commencement or development works to demonstrate to the local residents that they are committed to putting back into the community which will be most directly affected by the expanded airport.

#### 4. Immigration Removal Centres

One of the proposed uses for site F1 (at the top end of Stanwell Moor) is for the relocated Immigration Removal Centres. A development of this nature would require a functional design with high-level security features and extensive hardstanding. In view of the very considerable effect this would have on the Stanwell Moor community, we contend that this is a totally unacceptable use of the site and object in the strongest possible terms to its relocation here. Such a use would be totally incompatible with the high quality offices and hotels proposed as the southern 'Gateway' (and alongside one of the three proposed locations for a new or expanded terminal). Further information would be required about whether there would be housing and homelessness obligations for the 'host' authority (wherever it is built) for those who have left the centre.

#### 5. Surface Access/Public Transport

Spelthorne is sceptical that the current surface access proposals can increase the share of passengers accessing the airport via sustainable transport to at least 50% by 2030; and reduce the number of staff car trips to Heathrow by 25% by 2030. Meeting these targets will be key to ensure there is no adverse impact on air quality arising from additional vehicle journeys and traffic congestion.

- i. A southern rail access is essential to deliver modal shift and the additional transport demand generated by the expansion. In Spelthorne, 6.9% of our residents work at the airport and yet there are limited opportunities for access via public transport. Whilst there are proposals for southern rail access via heavy rail options these come with significant limitations. They rely on the already overstretched capacity of the existing networks. They also come at huge expense due to heavy rail construction and would have potential environmental impacts on our SSSI (and the need for the hybrid heavy rail rolling stock etc).

Spelthorne Borough Council is promoting a viable, cost-effective solution to the issue of surface access with our Southern Light Rail proposal. It represents a simple strategy to improve existing infrastructure and transport networks that will enhance connectivity for the airport whilst integrating with the heavy rail network to the south. It does not add to the existing network and therefore prevents additional track capacity issues and bottlenecks currently experienced on the network.

A Light Rail proposal can offer a high frequency service at 6 minute intervals from our existing station at Staines-upon-Thames with a capacity of 14.6m passengers per annum. Included within the scope of the project is a park and ride interchange near the M25 at junction 14. At a cost of £375 million, which includes three stations and the park and ride facility, the Southern Light Rail will deliver an affordable and cost effective public transport solution to meet Heathrow's targets for surface access and modal shift. Most of the alignment for the line is in our borough and we are keen to accommodate an asset that will also deliver benefits for Spelthorne in terms of the improved access to the airport and the economic opportunities for Staines town centre that the scheme could bring.

Light Rail solutions for airport surface access have been tried and tested across the globe with other similar schemes, some comprising of fully automated, driverless rapid transit systems, in locations such as Dubai, Bangkok, Beijing and Vancouver, and is widely recognised as a reliable, resilient and convenient transport solution. Of modular construction with minimal footprint that keeps costs low, this system could be constructed quickly and in time to align with or ahead of the airport expansion timetable.

HAL should support and commit to help fund pay for the capital cost of the Southern Light Rail implementation.

- ii. Public transport to the airport from Stanwell Moor and Stanwell is very poor and must be improved if the community is to benefit at all from an expanded airport. HAL must commit to paying capital and revenue costs (in perpetuity) for the introduction of regular and quick bus routes to enable local residents to access jobs at the expanded airport.
- iii. Full support from HAL for Spelthorne to be included within the London Transport Oyster Card Zone 6 operating area.
- iv. Minimising unnecessary vehicle movements - HAL is proposing a possible Cargo Hub in the north eastern corner of the borough (which the Council supports in principle). However, in order to ensure that HAL is able to meet the DfT's expectation that 'expansion is deliverable within air quality limits', the issue of emissions from traffic movements needs to be addressed now. The Council expect the Pod/shuttle link between the off-airport cargo area and the on-airport cargo facilities to the north of the Southern Perimeter Road to be delivered as part of any development of a cargo hub alongside dnata.
- v. Construction – HAL need to develop a Construction Environmental Management Plan covering traffic management (including designated routes for HGVs), site management, accommodation for workers and effective communications to minimise effects on local residents.
- vi. HAL need to pay the Council for staff time and resources where enforcement has to be undertaken because sub-contractors do not comply with the Management Plan or get relevant permissions in place before work commences (e.g. where temporary portacabins for construction workers are required).

## 6. Air Quality

Air quality assessments need to consider the health effects of worsening local air quality even below legal limits. Mitigation must comprise measures to improve air quality in

pollution hotspots beyond the immediate locality of the scheme as air quality impacts will be felt over the wider area. HAL must commit to continuous improvement in local air quality and at the very worst air quality should be no worse for our residents than it is now.

#### 7. Noise

Noise from the activities of Heathrow have a significant impact on the quality of people's lives, especially those who live close to the airport and beneath flightpaths. Spelthorne Borough Council expect to see HAL devise, implement, monitor and report upon an ongoing and challenging programme of continuous improvement to reduce the noise footprint of Heathrow with the objective of minimising noise below 'lowest observed adverse effect level' of 51 dB LAeq,16h.

As the Heathrow Noise Envelope is developed, Spelthorne would expect the ongoing reductions in noise from airport and aircraft activity to be shared and openly reported on to residents and the Council. Since changes in aircraft technology can result in the development of noise problems over time (e.g. as per Compton route), noise monitoring must be designed to identify such issues at the soonest opportunity and solutions implemented.

In presenting its case for a 3<sup>rd</sup> runway HAL has said it will bring increased periods of respite for residents, resulting in an improved quality of life. However, HAL has made it clear that on approval of the DCO and prior to construction of the 3<sup>rd</sup> runway that it would look to increase the capacity of the existing runways by 25,000 above the 480,000 ATM cap imposed by the T5 approval. It can only be assumed this is likely to cause existing respite periods to be reduced, which would be of significant dis-benefit to residents and their quality of life. HALs intention is disappointing. If it cannot be proven that such a proposal would cause 'no worsening of the noise environment' or 'no reduction in respite period' Spelthorne would strongly resist any increase in the runway capacity

#### 8. Flight Paths

Night flights should be banned. Not only this, strict penalties must be imposed for any breaches and all the monies must be put back into the communities affected.

HAL have put forward their preferred option on the timings of the night ban; these are clearly commercially driven. The views of residents must be taken into account before finalising the time when the flight ban will occur each night.

The Council would want to see planes gaining as much altitude as possible and quickly as possible, and removing the current stacking arrangements which limit the airports ability to do so.

Whilst Spelthorne supports reducing the number of people overflown by aircraft, insufficient information has been provided for the Council to make an informed decision. Spelthorne expect residents to fully benefit from quieter aircraft/airport technology and systems.

#### 9. Borough Boundary

It is imperative that there is no erosion of the borough boundary of Spelthorne. We appreciate that the 'red line' defining the application site for the Development Consent Order will extend into our borough and accommodate certain land parcels within it. However, the Council will vehemently resist any suggestion that our communities should be further disadvantaged by a potential boundary change which would mean that the

expanded airport would be under the jurisdiction of another authority who have no interest in protecting and supporting our communities.

Spelthorne would also expect to receive a significantly increased proportion of the business rates generated by the wider expanded airport to acknowledge the fact that, other than the creation of the NW runway, the majority of the expansion will 'move south and west' bringing its impacts right to the doorstep of our local communities.

#### 10. Protection of Staines Moor

Whilst the land could be better managed in order to safeguard the site in perpetuity, it is not considered suitable for enhancement and is best left undisturbed. It is of real concern that such a large SSSI is still within the potential development area of Heathrow.

The floodplain on Staines Moor and the surrounding ditches and pools provide the Moor with a huge floral and invertebrate diversity, making it one of, if not the most, biodiverse sites in the borough. Any work on the floodplain would drastically reduce this valuable habitat and disturb wildlife on the site. Disturbance from work adjacent to the site could also have an impact, particularly on bird species. This must be carefully monitored and every effort made to reduce the disturbance caused.

It is essential that any work to redirect the River Colne ensures the flow or character of the river on the Moor remains unaltered.

#### 2a. Please tell us what you think about the options for the new runway.

All the runway options are to the north of the existing airport and will not have any physical impact on Spelthorne. If option A is pursued, it will result in changes to the configuration of the M25, which would inevitably result in significant disruption to traffic whilst construction works are being carried out. HAL must ensure that robust plans are put in place to minimise any temporary impacts on the local roads and communities (in particular Stanwell Moor and Stanwell) whilst this work is undertaken, otherwise residents will suffer additional noise and poorer air quality.

#### 2b. What factors do you think should be important in fixing the precise location and length of the runway?

The Airports Commission said that the new scheme needs to deliver an additional 260,000 Air Traffic Movements per annum and there must be a full runway in order to support predictable periods of respite and maximise the use of the runway. A full runway is 3,500m (not the option of 3,200m which has been put forward). Previously HAL has suggested that the runway needs to be 3,500m from an economic and business case perspective. A shorter runway would not be able to accommodate the new generation of aircraft, increasing the likelihood that existing runways to the south would have to be used for these aircraft (with inevitable unwelcome consequences for our residents).

The Emerging Plans document talks about raising the runway by 3-5m above existing ground levels. There is no further information about the impacts this gradient change

would have on factors such as fuel use and pollution emissions. This will need to be fully addressed.

2c. What factors do you think should be important in locating new terminal and apron space?

Spelthorne Borough Council does not have any specific comments to make about the layout options (assembly of terminal, aprons and satellites).

If the 'chosen preferred option' for a terminal is to be to the west of T5, there would be clear scope for the Southern Light Rail option (covered in 1a. above) to be implemented, linking an expanded Heathrow Airport to Staines-upon-Thames. From there passengers could transfer onto the south-west mainline network. This option also provides the possibility for 'passenger check in' at Staines-upon-Thames to enable a smooth transition at the airport.

Current documentation only refers to a western rail link to T5 and a link from T5 through to the SW train line via a southern rail link. The alternative Southern Light Rail option would be quicker and cheaper to construct, delivering the required benefits within the timescales required.

2d. What factors do you think should be important in deciding the location of new taxiways

Expansion brings an opportunity for more efficient taxiways, which can reduce ground based aircraft emissions. These are currently higher than necessary as there are no end-of-runway taxiways and so aircraft have to queue to cross runways and access taxiways. Some aircraft also have to take longer routes around the airport to get to taxiways that can take the turning arc of an A380. Expansion is an opportunity to redesign the original hexagon airfield design. Emissions from ground-based aircraft activity account for 70% of ground-based NOx, and whilst those emissions are largely released within the airport fence, Spelthorne supports reducing unnecessary emissions by maximising the efficiency of taxiing.

Spelthorne notes that the taxiways at the eastern end would require a significantly greater land take than those on the western side. They would also be more remote. We recognise that it is not feasible to have planes crossing the runways in the middle. If the western taxiway option is pursued, this would have significant impacts on the existing community at the top of Stanwell Moor as it would bring aircraft considerably closer to the residential properties in the area (resulting in an additional noise burden for local residents). This impact (alongside many others) forms part of our argument for a greatly expanded Wider Property Offer Zone (see comments under 5a).

The borough has no comment to make on width and location of taxiways as these are determined by the size of planes.



3a. Please tell us what you think about the re-positioning of the M25.

HAL must appreciate that it is extremely difficult for local authorities (and any other consultee) to comment on the options given (with and without connector-distributor roads) without further information from traffic modelling about how the various junction options would perform in the different scenarios. It is disappointing that HAL has not provided such information at this stage of the consultation process. The Council therefore has to reserve the right to alter and amend its view when more detail comes to light.

Taking into account the limited information available at this stage Spelthorne would make the following comments:

It is essential that any option chosen minimises disruption to the M25 whilst the diversion is constructed.

The Council will strongly resist any solutions which result in greater impacts and/or congestion on local roads in our borough and the wider area. It is very difficult to comprehend how HAL has come to the conclusion that Junction 15 will not be affected by the realignment given the different vertical alignments of the carriageways concerned. The Council therefore reserves its right to give a view when more detail comes to light.

3b. Please tell us which family of options you prefer for the alterations to Junctions 14 and 14a and the reasons why.

As outlined above, it is difficult to comment on proposals for junction improvements when there is no detail of potential traffic flows derived from an agreed transport model so that the actual impacts on all highway junctions and local roads can be assessed. This is very disappointing because it does not enable us to even start to understand the implications of the most significant issues to affect our borough, i.e. additional traffic, noise and air pollution. The Council therefore has to reserve its right to give a view when more detail comes to light.

Whichever options are chosen for Junction 14 and 14a, there will be significant impacts on the Poyle Meadows SSSI. Family 2 of the options would have significant long and short term impacts on the community of Stanwell Moor.

3c. Please tell us which option you prefer for the diversion of the A4 and the reasons why.

This does not directly affect Spelthorne Borough Council. However, potential routes 2E and 3A do not appear to have been taken into account in the M25 diversion north of the runway where the motorway is shown emerging from the tunnel.

3d. Please tell us which option you prefer for the diversion of the A3044 and the reasons why

All the proposed diversions of the A3044 are within Slough and do not directly affect Spelthorne or its residents. It is assumed that Options 2a, 2ai and 3d will run parallel and

immediately adjoining the realigned M25. This would appear to be the shortest route for diverted traffic but would appear to be a very unpleasant route for non-vehicular traffic on the basis of their close proximity to the M25 (high noise levels and poor air quality) . The option 3g would create a longer route causing harm to the Green Belt by potentially opening up more land for development opportunities. This option would also create a much longer route for traffic heading north and then to destinations east of the airport.

3e. Please tell us which option you prefer for the Stanwell Moor junction and the reasons why

As outlined above, it is difficult to comment on these proposals when there is no detail of potential traffic flows derived from an agreed transport model so that the actual impacts on all highway junctions and local roads can be assessed.

Based on the limited information that has been provided, all four options for the Stanwell Moor junctions would have significant impacts on the parcels of land adjoining the junction. Any decision on the most appropriate, or least damaging, needs to be made in the context of other key decisions relating to access to, and the function of, the upgraded perimeter road and any new southern access to the airport. The options which involve grade separation, whilst potentially speeding traffic flow, would have the most significant visual and noise impacts on the residents of Stanwell Moor. The Council therefore consider these options to be unacceptable because of their impacts on the local community.

3f. Please tell us what you think about the options to improve access to the Central Terminal Area

The Council would generally support a new access to the CTA from the south as it is likely to benefit airport workers living in Spelthorne but only if it was designed to ensure modal shift and was not open to all forms of private car use. Once again much more information is required from transport modelling before a proper assessment can be made of the options. It would appear that any enhanced southern road access would be associated with a significant upgrading of the southern perimeter road to three lanes in each direction (with direct air quality consequences from greater traffic movements). If this option is chosen, HAL must deliver a robust traffic management system to ensure that the route does not become a “rat run” for local traffic and lead to consequential growth on local roads outside the airport. A southern rail access, preferably Spelthorne’s Southern Light Rail proposal, would offer greater opportunity to improve access to the south and help deliver modal shift.

3g. Please tell us what you think about the options for the diversion of rivers and the approaches to replacement flood storage.

As expected, the natural environment policy context is detailed and outlines the main requirements. Particularly relevant is the Habitats Directive and Water Framework Directive, which highlights HAL’s need to protect and enhance biodiversity associated with water. This is vital with the RAMSAR (A RAMSAR site is a wetland site designated of

international importance) and SPA (Special Protection Area is a designation under the EU Directive on the conservation of wild birds) designation of the borough's reservoirs. The document states that further details on flood risk will be made available during the 2nd consultation. It is concerning that very limited information has been provided at this stage and there is currently no firm view from HAL on how they plan to address flood risk.

The Council is pleased to note that the water environment section outlines the importance of flood protection and connected, sustainable water resources. However, information is sadly lacking on HALs plans to combine the Colne and Wraysbury rivers into one, and most crucially how they plan to monitor the results of this for associated wildlife, and assess the impacts this has on river channels and potential changes in flooding regimes. This must be addressed. Scant information is given about the impact on wildlife which is not acceptable given the importance of the reservoirs for over-wintering wildfowl.

Detailed modelling has not been provided to enable the Council to assess impacts on the hydrology, flooding and potential changes in river flows due to development and for appropriate assessments to be undertaken. Flow changes in the Colne and associated tributaries could have impacts downstream and in particular timings of flows into the Thames which in turn may affect flooding from the Thames. Spelthorne suffered in the 2014/15 flood with hundreds of properties and businesses badly affected. Residents along the Thames must have the reassurance they need that an expanded Heathrow will not put them at additional risk of flooding. The Council will not accept any development which will put additional properties, businesses and livelihoods at risk.

Flood assessments must be integrated with work carried out on the River Thames Scheme and HAL must work with the EA on the project. Given the zones proposed for further development at Heathrow and increased activity as a result, Heathrow could be significantly impacted if there was a large flood from the Thames which inhibited access to the airport.

The River Colne that runs through the centre of Staines Moor provides a valuable resource in itself, providing good habitat for many species of freshwater fish and invertebrates. The river also attracts rare over wintering birds like the Water Pipit. It is essential that any work on redirecting the River Colne takes this in to account and prevents the flow or character of the river on the moor from being altered in any way whatsoever.

HAL must install sustainable drainage whichever development option is taken forward.

4a. Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport supporting facilities.

Please refer to our detailed comments on each of the sites in Spelthorne

4b. Please tell us what you think about our approach to providing car parking and the potential site options we have identified.

Please refer to our detailed comments on each of the sites in Spelthorne. In terms of the approach taken, it is not clear whether the proposals mean that there be more or less car

parking in future at the airport. It is suggested that there will be less employee parking (as part of the requirement to reduce car mode share amongst those who work at the airport), but the plans appear to suggest that there will be more passenger car parking than at present within the airport. The case for this is made on the grounds that passengers using their own car to get to the airport only generate two trips (one to and one from the airport) whereas those using private hire (non-backfilled) and 'kiss & fly' vehicles generate four trips (there and back twice). Whilst the Council understands that the airport wants to reduce the attractiveness of 'kiss & fly' by either relocating drop-off bays to less convenient locations, or introducing a drop off charge, it would be more beneficial if passengers moved to public transport as opposed to driving themselves.

Expanding passenger parking onsite would not necessarily reduce off-site parking by third party operators which Heathrow has no control over. This may mean that customer parking would increase both onsite *and* offsite which would severely hamper efforts to support modal shift.

Long stay capacity further away from the airport would in itself encourage some modal shift to public transport. Such options could include the Council's Southern Light Rail option, which incorporates a proposal for a park and ride facility. Making long stay parking more attractive would be counterproductive to the success of this policy. The ultimate aim should be to reduce the total number of car parking spaces on the site for both employees and passengers which would help HAL meet the 'no more cars on the road' pledge.

4c. Do you have any comments on the land uses that will be affected by Heathrow's expansion

Please refer to our detailed comments on each of the sites in Spelthorne

4d. Please tell us what you think about the sites identified for the relocation of the Immigration Removal Centres? If you have a preference, please tell us why

One of the proposed uses for site F1 is for the relocated Immigration Removal Centres. A development for this purpose would require a functional design with high-level security features and extensive hardstanding. In view of the very considerable effect on the Stanwell Moor community, we consider this to be an unacceptable use of this site and strongly object to its relocation here. Such a use would be totally incompatible with the proposed quality offices and hotels (and alongside one of the three proposed locations for a new or expanded terminal). Further information would be required as to the process for those who have left the centre and whether there would be housing and homelessness obligations for us as a 'host' authority.

In terms of the Immigration Removal Centres, site 'A4' at Holloway Lane in West Drayton is a significantly larger site and the facility could be accommodated further away from existing residents than is possible on the F1 site. In addition, the A4 site has the added benefit that the M4 can act as a barrier to West Drayton itself. The London Borough of Hillingdon currently houses the two immigration centres associated with the airport and has the infrastructure in place to deal with these sites.

Site E3 in Spelthorne adjoins E1 Mayfield Farm within the borough of Hounslow. It is noted in its site assessment that it could accommodate the replacement Immigration

Removal Centres. The location of this site is in close proximity to Spelthorne's borough boundary and our nearby towns of Ashford and Staines-upon-Thames, which may experience impact from such a use. If this site were selected, further information would be required as to the process for those who have left the centre and whether there would be housing and homelessness obligations for nearby authorities.

4e. Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport related development.

Please refer to our detailed comments on each of the sites in Spelthorne

4f. Do you have any views on how the demand for additional airport related development such as hotels and offices might best be delivered?

The consultation indicates a number of possible locations for hotels and offices and Spelthorne have commented on these under our response on specific sites. HAL appear to have constrained themselves by only considering locations very close to the airport.

A real opportunity has clearly been lost to think about what options exist slightly further away from the airport (e.g. locations which can benefit locally from the economic growth). The Council is promoting a Southern Light Rail (SLR) option which would link Staines-upon-Thames to Heathrow as a viable alternative to the heavy rail solution. SLR would be quicker to construct, offer a faster, more regular service and be less expensive. A station in the centre of Staines-upon-Thames offers the clear opportunity for airport hotels and international headquarters to be built there and linked to Heathrow with a 7 minute journey time. Such opportunities would provide economic benefit to the wider area around Heathrow, reduce the need for as much development immediately south of the airport (and therefore help alleviate the significant impacts on Stanwell Moor and Stanwell) encourage sustainable transport and the modal shift that Heathrow need to deliver, and help to mitigate the deterioration in air quality which would otherwise occur.

4g. Please tell us how you think we should best bring the various components together to build our masterplan for the expansion of the airport and what factors you think should be most important in our decision-making

The Council agrees that HAL need to look at the various components together and to establish whether there are areas with interdependencies. It seems sensible to consider these around the workstreams proposed, i.e. (1) Runways, M25 alignment and rivers (2) terminal, satellites, and aprons (3) land use, M25 junctions and local roads (4) landscape and mitigation. However, the seven proposed masterplanning themes appear to be inward looking (how the airport would operate) and appear to give scant regard to the wider area outside its borders.

The themes do not give sufficient prominence to an assessment of the wider impacts on our communities of Stanwell Moor and Stanwell. It is not right that there is only one theme called "minimise land take and impacts on existing settlements and foster community integration". It is not at all clear what community integration means – does it relate to

opening up physical access and connectivity, or it is talking about the delivery of facilities for the community (whether open space, enhanced recreation, re-providing community halls or building and providing funding for the new leisure facilities)?. The Council believe that it must include both of these.

There has to be a separate theme around the wider impacts on local communities. There must be more emphasis on how the development will minimise the impact on local road networks, and there is no reference at all as to how HAL will look at minimising or mitigating noise or air quality. No consideration is made on the wider connectivity issues and the need for the modal shift to be delivered by other options such as the southern rail route (see comments elsewhere on the Southern Light Rail).

Consideration must also be given to the temporary impacts of construction as this may affect different communities to a greater or lesser extent than the final expanded airport.

The Council is in support of HAL developing four sub zonal assemblies (north/north east, south west, west/north west and east/south east) as long as there is recognition of the links between the various sub areas – especially the south west and west/north west.

4h. Please tell us what you think about the sites we have identified as potential construction sites, and the approaches we are considering to manage the effects of construction

Please refer to our detailed comments on each of the sites in Spelthorne

Section 2.11 of the Airport Expansion Consultation Document (January 2018) appears to focus predominantly on the potential temporary construction sites. It is essential that the effects of the both the temporary construction sites and the sites where development is taking place are effectively controlled to minimise the effects on local communities and the local environment (including local wildlife/biodiversity). This includes all forms of pollution (noise and other nuisance, air quality, water and land) plus loss of amenity.

We would expect to see a clear **Construction Environmental Management Plan** to include measures to address:

1. Traffic management

- a. Promotion of sustainable travel plans for construction workers and other site traffic (minimising movements of HGVs etc.)
- b. Designated routes for site traffic (HGVs, light vehicles, workers), minimising effects on local communities and environmental impacts.
- c. Highways safety and maintenance during construction (traffic signage and road markings, maintenance of roads for local and through traffic plus kerbs, footways, paved areas and street lighting). A highways condition survey should be undertaken prior to development to assess the effects of future construction traffic movements.
- d. Safe vehicular access to sites (avoiding queuing, turning in road etc.)
- e. Temporary road closures (minimising effects on the local road network)
- f. Covering of vehicles transporting materials and waste
- g. Wheel washing facilities for plant, equipment and machinery
- h. Cleaning of roads
- i. Vehicle parking for site operatives (whilst working and staying in temporary accommodation), ensuring that workers do not need to park in residential areas. It is positive that the consultation document indicates that a bus service

will be provided *‘to transport the construction workforce to and from parking zones, areas of accommodation and linking to the public transport network’*. It is not clear at this stage where these parking zones will be located. It is important however that workers are required to use these facilities, rather than parking in nearby residential areas.

- j. Use of rail - The consultation document refers to the ‘use of rail freight to import bulk materials, reducing movements and effects on local roads’. No detail is given as to which rail link would be used for this purpose and where the bulk materials will be offloaded prior to transport to the construction sites. This in itself may cause localised problems in terms of congestion, noise and air pollution and would need careful control.
- k. Use of pre-booked delivery slots – the consultation document refers to this as a way of controlling the time of each delivery. The travelling times for vehicles heading to the site are likely to vary considerably due to congestion of arterial roads (including the M25). It is essential that these vehicles do not use local roads to park whilst awaiting their delivery slot. Consideration therefore needs to be given to providing a suitable holding site for vehicles which arrive in the area outside their designated time slot.

## 2. Site management

- a. Protection of neighbouring sites (including impact on nature conservation and biodiversity)
- b. Drainage and water supply to sites (prevention of site run-off etc.)
- c. Avoiding contamination of land
- d. Measures to control noise during construction
  - i. Identifying areas likely to be affected/receptors
  - ii. Designing appropriate mitigation measures
  - iii. Hours of work
  - iv. Timing of deliveries and other movements
  - v. Monitoring effectiveness of controls  
(It is unclear at this stage whether prior consent application will be submitted).
- e. Measures to control nuisance including dust, odours and fumes during construction, including siting and managing stock piles
  - i. Identifying possible sources
  - ii. Assessing likelihood of dust, odours and fumes being created taking into account location of work, construction materials and weather conditions
  - iii. Identifying areas likely to be affected/receptors
  - iv. Designing appropriate mitigation measures
  - v. Monitoring effectiveness of controls
- f. Control of light pollution - minimising effects on neighbouring properties.
- g. Erecting and maintaining security hoardings – possible use of safe viewing areas for public viewing
- h. Storage of plant and materials
- i. Minimising loss of privacy/light
- j. Site waste management plan including:
  - i. Minimisation waste/recycling/responsible disposal of waste
  - ii. Preventing fly-tipping/bonfires

## 3. Promotional material and communications

- a. Ensuring regular communication with local stakeholders (including local authorities, residents and businesses)
- b. Identified contacts/hotline for reporting problems

4. Accommodation for construction workers
  - a. Identifying suitable and sufficient accommodation for site workers, including:
    - i. Residential accommodation (for workers who do not live locally). Working with local authorities to prevent illegal sites developing (e.g. unauthorised caravan sites).
    - ii. Providing other suitable accommodation for the health, safety and welfare of site workers (to prevent adverse effects on local communities)

HAL need to pay the Council for staff time and resources where enforcement has be to undertaken because sub-contractors do not comply with the Management Plan or get relevant permissions in place before work commences (e.g. where temporary portacabins for construction workers are required).

5a. Please tell us what you think about our Property Policies

The Residential Property Policy acknowledges that HAL is consulting on various development options which might impact on Compulsory Purchase Zones (CPZs) and Wider Property Offer Zones (WPOZs). The Council welcomes this.

The Council supports the principle of a WPOZ which gives residents the option to sell to Heathrow – independent valuation for property (without expanded airport) plus 25%. The Council also accepts the principle of a Property Hardship Scheme (PHS) which gives the value of the property without the expanded airport but no uplift. Being “substantially adversely affected by the construction or operation of the runway” appears to be very high bar and should be lowered to “adversely affected”. The PHS panel appears to be as independent as it can be.

That said, the Council is firmly of the view that the current boundary of the WPOZ does not go anywhere near far enough. Two of our most impacted communities, Stanwell Moor and Stanwell, are currently both excluded from the WPOZ, although the policy document recognises that Stanwell Moor may be a possible additional area. There is nothing set out to show the decision making process behind the drawing of these boundaries, so the Council has no idea what factors HAL took into consideration when drawing the boundary of the Wider Property Offer Zone.

The residents of Stanwell Moor and Stanwell will be significantly impacted by the expansion of the airport itself, greater noise from the western taxiways, likely air quality impacts, infrastructure and changes to M25, additional traffic from re-routed traffic flows (likely to move from north and east more to the west and south), airport support facilities and airport related development. They will also be impacted during construction.

HAL must recognise these temporary and permanent impacts by expanding the WPOZ to include the whole of Stanwell Moor, and large parts of Stanwell. A map is attached (**Appendix 4**) which sets out the Council’s position on where the boundary has to be drawn.

5b. A noise envelope is a package of measures that can be used to reduce noise. Please tell us your views on the objectives of the noise envelope and the timeline for its development



Spelthorne welcomes HAL's commitment to the International Civil Aviation Organisation's "Balanced Approach to Airport Noise Management", their promise to develop by design a quieter airport at Heathrow, and their commitment to a noise envelope for Heathrow. Over the coming months the Council looks forward to seeing details of how noise from Heathrow's related activities will be minimised/controlled/mitigated.

Spelthorne expects to see HAL developing clear, on-going, challenging and regularly reported performance targets that aim to reduce noise levels below those currently experienced, regardless of the expansion of Heathrow.

The Government's 'UK Airspace Policy' includes the statement that adverse effects are considered to be those related to health and quality of life. They will be assessed using a risk based approach above Lowest Observed Adverse Effect Level (LOAEL). In order to properly assess the potential adverse effects of airspace change, 51 dB LAeq,16h will be regarded as the LOAEL for daytime noise from airborne aircraft. Assessments of airborne aircraft noise levels down to 54 dB LAeq,16h have been presented within the consultations. The justification given is that identifying a LOAEL for aviation noise is not straightforward and that at relatively lower noise levels (by implication below 54 dB) it is difficult to both estimate and measure noise exposure at greater distances from airports where airport noise levels are closer to those of other noise sources. This is not a convincing argument; the survey work which underpins the findings of the 'Survey of noise attitudes 2014: aircraft' (which was carried out by the CAA and underpins the policy adoption referred to above) is heavily based on responses from people living around Heathrow Airport (almost 77% of the total). Very heavy reliance is placed on the responses of people living around Heathrow to determine the general attitude of the UK population to aircraft noise. In addition, more than 50% of those respondents are exposed to daytime aircraft noise level below 54 dB LAeq,16h. This is at odds with the information set out in the tables on pages 42 to 46 of the earlier consultation in that noise exposure at the higher adverse effect levels, SOAEL and UAEL, are clearly set out, but no reference is made to the LOAEL. There is an argument that providing information about noise effects down to 51 dB LAeq,16h is not essential in this comparative study since all three schemes have been assessed against the same standards. However, there is no doubt that such information would have greatly enhanced the study and better informed people living in areas adversely affected at the lower noise levels. This clearly applies to Spelthorne. The Council would expect information of noise effects down to 51 dB LAeq,16h to be provided and to be taken into account in the design of mitigation and noise control measures.

The Airports Commission expects to see the benefits of any reduction in noise shared equally with residents. Spelthorne wants to see the ongoing reduction in noise from airport and aircraft activity shared with residents and this reported upon.

Since 2007, Spelthorne residents living along the **Compton route** have been impacted by an increasing number of larger and heavier aircraft which struggle to make the turn and achieve the required height to minimise disturbance. Research has been carried out on the causes of this, but while HAL has reported it will work with NATS to review procedures along the route, some two years later still no improvement has been experienced by residents. The Council expect the noise envelope to anticipate and quickly resolve growing noise problems resulting from developments in new aircraft and technology (e.g. in the Compton route instance with larger and heavier aircraft). It also needs to secure continuous improvement in the noise environment experienced by residents.

5c. Is there anything further we should be considering to reduce noise?

Expanding Heathrow will increase road traffic accessing Heathrow via the southern access roads. This will result in greater road traffic noise that will impact on residents. HAL needs to consider and mitigate the impacts of this noise increase.

5d. Please tell us what you think about our suggested approach to the provision of respite

Spelthorne welcomes the added respite brought about by the greater variation of alternation a 3<sup>rd</sup> runway would afford. That said, Spelthorne notes HAL's intention to use the existing runways to create an additional 25,000 flights per annum once the DCO has been granted and prior to the completion of the 3<sup>rd</sup> runway. A consequence of this is likely to be a reduction of the existing respite periods which would have an adverse impact on residents quality of life.

Within its consultation documents HAL has made much of the fact that a 3<sup>rd</sup> runway will bring increased periods of respite for residents and therefore resident's quality of life would be improved. Unless it could be proven that there would be no worsening of the noise environment and no reduction in respite periods, Spelthorne will strongly resist an increase in runway capacity above the 480,000 ATMs imposed for the operation of the two existing runways.

5e. Please tell us what you think of our proposals for noise insulation and phasing of delivery

The noise insulation scheme is essential to protect sensitive and residential buildings from aircraft noise and Spelthorne supports this. Since people living to the west of the airport are exposed to the highest noise levels (on departure) approximately twice as often as those living to the east, they will have to be exposed to higher long term noise levels before they qualify for sound insulation compared to those living to the east. This is inequitable. In the Consultation Response on UK Airspace Policy of October 2017, the Government identified in para 2.39 that future policy may require airspace change promoters to consider compensation for significantly increased overflight, based on appropriate metrics, which could be decided according to local circumstances. Spelthorne will therefore require a proper assessment of overflights, and HAL must ensure adequate corresponding compensation is offered when a detailed application is made and an ES submitted.

Noise insulation does not offer any relief from noise within gardens and open spaces close to the airport (impacting on the overall quality of life for residents). HAL must therefore provide reliable, affordable public transport (in perpetuity) so that residents can easily visit quiet locations away from the noise of the airport

5f. A 6.5 hour night-flight ban on scheduled flights is required sometime between 11pm and 7am. Our current preferred option for this is from 11pm to 5.30am. Please tell us when you think the night-flight ban should be scheduled and why.

For economic reasons HAL has expressed a preference on a 6.5 hour night-flight ban on scheduled flights between 11pm and 5.30am. The Airport Commission has expressed a

wider view. Spelthorne expects HAL to listen to residents affected by night flights and fully consider their needs to achieve a compromise on the times for the night-flight ban.

5g. Please tell us what you think about our priorities and initiatives we propose to use to develop our surface access strategy

It is still not clear what HAL's pledge not to "increase landside road traffic" actually means, particularly in the context of the proposed junction and access improvements referred to in the Consultation.

Spelthorne agrees that affordable and convenient transport choices for colleagues and passengers are critical to achieving sustainable surface access. The document on Surface Access states that where there is good public transport, passengers want to use it. It is essential that there is good provision in the local communities surrounding the airport that benefit both passengers and colleagues. The airport surface access strategy must contain specific targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking. These should apply to both the workforce and passengers, and should consider modal shares across geographical areas as well. HAL has acknowledged there is a significant potential for modal shift in Spelthorne as it has a higher proportion of people accessing the airport as lone car drivers due to poor public transport connectivity. Spelthorne agrees there is a need for regular and quick new bus routes to and from the areas to the west and south. HAL should reduce the disparities in public transport measures available in surrounding communities. We would want to see public reporting on performance against modal share targets including subdividing by geographical area.

The data on surface access reveals that the number of passengers travelling to and from the airport by taxi, private hire vehicle or hire car (at about 17m passengers per annum, or 34% of passengers arriving/ leaving) is the highest mode share of all forms of transport and is almost as many passengers as those travelling by all other forms of public transport (39%, circa 19 million using local bus, coach, underground and rail). As a consequence taxis and private hire vehicles equate to 31% of total daily vehicle movements travelling to or from Heathrow. However, this dataset (Table 2.4 of the Surface Access report) excludes empty return trips from the figures. There are an estimated 40,000 empty return movements per day, equating to almost as many daily vehicular movements as made by colleagues, and more than those made by passengers. So in reality taxi movements including empty returns are likely to account for around half of all Heathrow-related vehicle movements. Surface access by taxi or private hire vehicle is currently no more sustainable than 'kiss and fly' passenger drop offs.

The surface access data presented also indicates that there are three times as many passengers travelling to the airport than colleagues, but there is a higher number and proportion of cars travelling to or from Heathrow by colleagues than passengers. In part this is because colleagues travel both to and from the airport each day whilst passengers typically travel one way only on a given day. It is clear that affordable and convenient options for colleagues are also key to minimising the impacts of surface access

It is important to point out that existing public transport improvements such as Crossrail, Western Rail Access and the Piccadilly line upgrade are there to deal with existing

demand under a two runway airport - not to cater for expansion. No commitment has been made by HAL to a sustainable improvement to public transport that will meet the needs of an expanded airport, particularly to the south. It is not plausible that 'no more traffic on the road' can be delivered without improving rail access from the south which (not coincidentally) is the geographic area with the highest mode share for private cars. There is a key link between where those employed by HAL or 'in airport'-related businesses live and areas with better access. More workers living south of the airport drive to work. HAL needs to consider where the *future* workforce will be secured from and encourage a greater spread of employees with an equitable choice of transport modes around the whole airport region.

As discussed above, Spelthorne is concerned that the shift to public transport required to deliver a 'no more traffic' pledge cannot be facilitated by existing heavy rail network capacity so there is significant doubt over HAL's assertions that they do not believe southern rail access is necessary in order to meet the targets. The light rail solution promoted by Spelthorne would represent additional public transport infrastructure without impacting on heavy rail network capacity.

5h. Please tell us what you think about the options to use road-user charging to reduce emissions and to manage vehicular access to the airport.

Whilst Spelthorne supports a Heathrow Low Emission Zone in principle, there is a balance to strike so that cars are not displaced into surrounding areas and park inappropriately in local roads. There are also many permutations of how such a zone could operate in terms of the size of the zone, vehicle types included, level of charges, and times of operation. More detail is required on these options in the next consultation.

Previous submissions to the Airports Commission have stated that there is an opportunity to ring-fence revenue in the form of an enhanced 'Super Public Transport Levy Fund' which could be used to support funding of major surface access schemes, and to fund sustainable transport projects in the wider area to the benefit of local communities. It is noted that there is no mention of this within Consultation 1 which is of very considerable concern. Currently the Sustainable Transport Levy operated by Heathrow Airport Ltd is only accessible to projects that directly benefit Heathrow. A wider fund must be provided by HAL which would enable local authorities in the area to progress air quality action planning measures to tackle poor air quality from other sources, in turn helping reduce the significance of airport emissions and increasing headroom to air quality **limits**.

Spelthorne supports emission-based pricing for access to car parks, with cleaner less polluting vehicles paying less and having better access to terminals. However this may push higher polluting vehicles onto local roads (see comment on requirement for a Controlled Parking Zone).

No evaluation of parking options has yet been carried out. The location of airport parking provision will have a very significant impact on traffic routing and local air quality. These issues must be factored into the evaluation and we would expect to see detailed evidence of this in the next consultation. Due to the dearth of information we are unable to comment in more detail on this incredibly important issue for our local communities.

5i. Please tell us what you think about the measures proposed to manage emissions. Are there any other measures that we should consider

Development of approach to dealing with air quality

The focus of the Consultation 1 (and the draft Airports NPS) is very much on UK compliance with legal obligations but air quality pollutants affect human health (and/or on the natural environment) at exposures that are below the legal limits. Worsening of local air quality below compliance levels can still have a moderate or substantial health impact, which could be locally significant, even where those changes occur in places where the long-term concentration is 75% or less of the assessment level.

Mitigation must comprise measures to improve air quality in pollution hotspots beyond the immediate locality of the scheme as impacts are likely to be over the wider area.

HAL has made a commitment to not increase the amount of airport-related vehicle traffic on the road. However, the scheme could redistribute the location of the airport-related traffic around the airport. The preferred options shift the focus of surface access to the Airport from the north to the south via Junction 14 of the M25 to both the western terminal area (Terminal 5) and via a potential new southern road tunnel into the Central Terminal Area from the Southern Perimeter Road. With the diversion of the A4 and the severance of the A3044 and Northern & Western Perimeter Roads, the main landside link between the two terminal areas following expansion will be via the south of the airport rather than the north. The A3113 and Southern Perimeter Road form the northern boundary of the Borough of Spelthorne. Even if HAL achieve their pledge of no additional airport-related traffic, the expansion will result in significant additional traffic flows across the north of Spelthorne. We feel that there is also significant potential for inappropriate local re-routing across the borough of Spelthorne and that there is likely to be a substantial increase in Heathrow related traffic on other local roads [hitherto not mentioned in the documents such as B3003/ B378, A244 and A30, plus local roads such as Long Lane and Bedfont Road], where improvements and mitigation will also be required.

Heathrow related traffic has been defined as “movements by motorised vehicles into and out of the airport and using the public highway whether carrying passengers or colleagues or for the purposes of airport related freight and servicing”. This definition therefore does not include traffic on airport controlled roads that are not public highway such as the Perimeter Roads and tunnels. The definition must include traffic on all roads, as vehicle movements on the airport controlled landside roads could have significant highways, air quality and noise impacts. The Perimeter Roads currently carry a high proportion of traffic circulating around the airport between terminals, car parks and other ancillary airport facilities. These movements must be included in both the baseline and future assessment of vehicle movements.

In the Emerging Plans document, HAL has conceded that their preliminary traffic model shows a large increase in traffic due to the severing of the A3044, the removal of J14a of the M25 and a new southern access tunnel. With the loss of the Northern and Western Perimeter Roads, their functions will need to be transferred to other routes in the future road network. There will be pressure on the Southern Perimeter Road as a key access route, worsened by planned increases in cargo at the airport and increases proposed in coach and bus transport. The existing junctions along the southern access road have been modelled to have insufficient capacity to deal with the increase.

The Emerging Plans document sets out three options for the Southern Perimeter Road: increasing to three lanes in both directions; producing an alternative access to the Cargo Area; or introducing demand management measures, such as road user charging. The make-up of measures is to be assessed via highways modelling, factoring in environmental and community issues into any emerging preference. It is our view that air quality impacts should carry due weight in this assessment.

Modelling commissioned by Spelthorne Borough Council, using ADMS-Airport by CERC for the Spelthorne area for 2011 and 2015 indicates an existing shadow of exceedance of the annual mean nitrogen dioxide air quality objective within Spelthorne to the south of the A3113, the southern runway and the Southern Perimeter Road. Redistribution of road traffic from the north of the airport onto southern routes would almost certainly exacerbate both pollutant levels within and the spread of this shadow – thereby potentially putting a greater number of properties in Spelthorne into an area of exceedance.

In their approach to air quality, Heathrow will be using atmospheric dispersion modelling to determine concentration of airborne pollutants emitted from all significant sources associated with Heathrow. This is discussed in terms of changes in pollutant concentrations affecting the health of local communities, but it is not clear how changes in concentrations will be translated into health effects and whether health impacts will also be modelled. The Council takes the view that this must be done. One methodology that could be used would be changes to local mortality burden. Air quality is also included as an environmental factor within the Health Impact Assessment, but there is still a place for the air quality assessment to cover health impacts below limit values.

The Surrey Air Alliance is undertaking detailed air quality modelling across the County which will include Local Mortality Burden calculations and GIS modelling of attributable deaths by ward, associated life-years lost by ward, attributable health cost by pollutant and the combined impact of the pollutants. Health costs or damage costs are possible methods that could be used to inform how much mitigation of air quality impacts is appropriate to the scale of the potential effects of expansion on local air quality.

In response to the recent draft Airports NPS consultation, Spelthorne's representation included comments on assessment of air quality compliance using the PCM model. The PCM model does not include links on the M25 motorway, nor the Southern Perimeter Road. The air quality assessment in the environmental statement must model all main roads across the wider area (all around the airport) and local roads in the immediate vicinity of the scheme. The PCM model baseline projections significantly underestimates nitrogen dioxide levels in comparison to local monitoring. The assessment must therefore take account of air quality monitoring data from the local authority networks across the Heathrow area, and not just the HAL continuous monitoring stations.

It is noted from the Emerging Plans that not all displaced uses are to be delivered through the DCO process. The highways and air quality assessments for expansion must consider the cumulative impacts of expansion with existing consented major schemes, likely schemes from the Local Plans of the neighbouring Local Authorities and all displaced uses (whether in the DCO application or not).

HAL has established the Air Quality Expert Review Group (AQERG) to provide a technical check and challenge of their approach to the AQ assessment. The purpose of the group is to provide an independent and expert perspective. Spelthorne welcomes the use of independent industry experts by HAL, but it is unknown from Consultation 1 how the group will operate and how transparent this process will be. Unless the outputs of the AQERG

are shared with stakeholders, the value of their involvement for stakeholder reassurance will be greatly reduced and it will be unclear if HAL is following their recommendations. There is currently no commitment to share the outputs of the AQERG or demonstrate how the AQ assessment has been tailored by their review. HAL must commit to doing so.

It is customary for air quality dispersion modelling of airport schemes to include the whole aircraft landing and take-off cycle, including operations on the ground and in the air up to 3,000ft (~1,000 metres) above ground level. It is commonly accepted that in reality emissions above about 1,000 ft make a negligible contribution to local air quality levels on the ground. The Approach to Air Quality document refers to research that concluded negligible effects on ground level air quality once aircraft are above 350-650ft (100-200m) on departure and 160-350ft (50-100) on arrival. However the past inventory approach has been to tabulate both total emissions to 1,000m and also just ground level emissions. It is our view that consistency of approach must be maintained so that future modelling can be compared to past inventories. The dispersion modelling will in any event ensure that emissions at different heights are properly weighted in their contribution to ground level concentrations. Once the air quality modelling is undertaken it will be helpful to demonstrate the limited effect of airborne aircraft emissions on local pollutant concentrations by mapping just airport-related contribution to annual mean concentrations of pollutants, with a plot showing just the airborne aircraft emissions contribution. This approach has been taken in the past in the 2013 Air Quality Assessment for example.

#### Proposed schemes and initiatives to manage potential air quality impacts

The peak construction workforce is estimated in the Emerging Plans as between 10-15,000 workers. It is outlined that there is to be provision for both public and private transport access for construction workers to make Heathrow expansion an attractive work location. In contrast to colleague and passenger travel, there are no commitments with respect to mode share targets for construction workers. This must be addressed bearing in mind the length of the construction project. There is no detail yet as to how, how much and where parking provision would be made for construction workers, except for there being bus shuttles to ferry workers between car parks and construction areas. With this size of workforce there is potential for significant highways and air quality impacts. With reference to Table 2.4 of the Our Approach to Developing a Surface Access Strategy, this could represent a potential uplift in Heathrow related vehicle movements of up to 20%, and is likely to be equivalent to more than all the bus, coach and commercial goods vehicles travelling to or from Heathrow on an average day in 2016. Spelthorne's view is that it is unacceptable that there are no targets or measures proposed to minimise the air quality impacts from this.

#### Are there any other measures that we should consider?

The commitment to not increase the amount of airport-related vehicle traffic on the road and increase the numbers of people using public transport is not going to be enough to "improve" air quality in Spelthorne. The shift in surface access from the north of the airport to the south west will significantly increase Heathrow-related vehicle movements along the north of Spelthorne and consequently have a detrimental impact on local air quality. Until the scheme masterplan elements are decided and the air quality modelling is undertaken the size, scale and significance of this impact is unknown. There is therefore insufficient information for Spelthorne to be able to judge with certainty from the Consultation 1 documentation whether the initiatives are sufficient to mitigate the potential air quality

impacts. Our view currently is that additional direct measures and offsetting mitigation measures are likely to be required.

Spelthorne agrees that there is significant potential to increase the number of colleagues who cycle to work (currently <1%). The travel to work data indicates that almost 20,000 colleagues live less than 5km from the airport boundary (i.e. >25% of colleagues). The viability and attractiveness of cycling is greatly influenced by the last leg of the journey from the airport boundary to the final destination. Currently cycle routes end abruptly at the Perimeter Roads making cycling unattractive along the final approach, particularly as there has been no access to the Central Terminal Area for cyclists through the northern tunnel for a considerable period of time. Colleagues, visitors and passengers will be reluctant to cycle if they have to change to public transport to get around the airport. If there is to be a Southern Access Tunnel this must have dedicated cycle infrastructure.

New rail services need to be affordable and not premium rate. Spelthorne agrees that there is scope to review the pricing structure of Heathrow Express.

Available data indicates that taxis currently carry 1.6 passengers on average per journey to/ from the airport. HAL is proposing a target of backfilling 20% of all empty taxi & private hire vehicles and increase average passengers per trip to 2.2 passengers per journey. This is to be achieved via priority queuing for full arrivals and a taxi sharing scheme. Even if this target is successfully met the number of taxi trips in 2040 will still be greater than the 2013 baseline. This is in contrast to targets to reduce colleague car trips be 12,000 trips per day by 2030 and 24,000 trips per day by 2040. Given that taxis currently account for about half of all Heathrow-related vehicle movements, the proposed taxi targets target do not go far enough. Options around access charges and vehicle emission standards need to be evaluated for taxis and private hire vehicles.

It is unclear from Consultation 1 whether the NOx emission reduction targets in Table 6.1 would be sufficient to offset the potential increase in total NOx emissions from an expanded airport.

Table 6.1 and section 6.2 (Potential additional operational strategies) does not include any strategies or measures in relation to taxis or greening of local bus fleets (both those serving public transport to neighbouring communities and those "Hoppa" type services around the airport serving hotels, car hire firms, parking sites (passenger & colleagues and HAL controlled & third party) and construction worker bus shuttles etc. This must be addressed.

The wider issues of connecting Heathrow to the wider public transport network, via a southern rail access, is key to a surface access strategy that can deliver modal shift away from private vehicles thereby reducing congestion and air pollution. Spelthorne's Southern Light Rail scheme would achieve these benefits and is discussed further elsewhere in this response.

5j. Do you have any comments on our approach to limiting carbon emissions from the design, construction and operation of an expanded Heathrow?

The approach set out in regards to carbon and climate change is highly encouraging, particularly the overarching aspiration to make growth from the new runway carbon neutral and the objective to operate a zero-carbon airport. It is key that these overall goals and



commitments regarding carbon emissions are fully considered early in the design stage and used as design evaluation criteria.

The aspiration and related objectives at this stage appear high level and lacking in specific details. There must be clarity and more detail on exactly how these will be achieved, broken down into a clear action plan. There also needs to be details on how progress against each objective will be measured, monitored and reported upon.

The investment HAL has put into Electric Vehicle (EV) infrastructure through the airport is highlighted. We need to see more support towards a wider network encompassing neighbouring areas to Heathrow. This would provide further support to colleagues living in these areas and facilitate taxis and private hire vehicles in making the transition to Electric Vehicles. It would also assist with wider AQ benefits through faster and greater uptake of EVs by the residents and businesses in the local communities to help offset increased surface access emissions to the south of the airport.

5k. Please tell us what you think about our approach to natural environment issues.

HAL has highlighted the importance of integrated and connected green infrastructure which is welcomed (it is important to have a continuous habitat corridor for wildlife to move through). Multifunctional green infrastructure is a positive idea although there is a concern it will allow HAL to reduce the amount of green infrastructure created as areas can 'tick' multiple boxes at once. This must be monitored to make sure it is an additional bonus and not a way of 'shoehorning' the benefits into a very small area.

The map showing the plan outlines is good – wildlife corridors are visible and lead into surrounding areas of biodiversity. The diverted Colne Valley Way runs through Staines Moor. This could be a positive thing but it could also lead to other human issues, litter, disturbance to wildlife etc. and so would need careful positioning. Protected species areas are scattered around seemingly randomly and more detail will be needed to specify what species each of the sites aims to support. Staines Moor contains the oldest known colony of yellow meadow ants in the whole country. Any work on the northern end of the site would destroy this valuable resource which is not only of historical importance but also provides a valuable food source for many species of bird, particularly Green Woodpecker. The Council would strongly resist any development in this location.

The bonehead woodland to the east of the SSSI provides a home for many bird species, particularly woodpeckers, and even a small population of deer. Reduction of this small area of woodland would probably lead to the loss of deer on the moor and would reduce the habitat available to many species of bird.

The floodplain on Staines Moor and the surrounding ditches and pools provide the moor with a huge floral and invertebrate diversity, making it one of if not the most biodiverse sites in the borough. The site is also used by important populations of birds like Skylark and Snipe. Any work on the floodplain would drastically reduce the amount of valuable habitat and cause disturbance to the wildlife on the site. Disturbance from work adjacent to the site could also have an impact, particularly on bird species and must be carefully monitored with every effort made to reduce the disturbance caused. Along with the river redirection, work on the floodplain could also alter the amount of water deposited on the floodplain. This could lead to a change in the historical composition of habitats at Staines Moor and would lead to a knock on reduction in biodiversity.

The whole of Staines Moor must be designated as a proposed protected species site and it is of real concern that such a large SSSI is still within the potential development area of Heathrow.

The cycle route is comprehensive and seems to connect well to the surrounding area. There is insufficient detail on how HAL aim to achieve each element and what exactly each section involves e.g. more detail on each potential historic enhancement area.

The level of surveying they plan to do prior to the work starting is good. There seems to be a good understanding of ecosystem benefits and there is also evidence of stakeholder engagement which will be very important on some of our sites (particularly with the Staines Common Steering Group and local resident associations).

The section on biodiversity again says all the right things, and collaboration with Natural England is critical. The guidelines are general with very little information specific to local sites and wildlife which means it is impossible to undertake a proper assessment of impacts. These details must be made available in future consultations. Again, there is only a very brief section on landscape and visual amenity. Considerably more detail is required on how a balance will be struck.

5l. Are there any opportunities that the expansion of Heathrow could provide to enhance the natural environment?

Natural environment policy context is detailed and outlines the main requirements. Particularly relevant is the Habitats Directive and Water Framework Directive, specifically Heathrow's need to protect and enhance biodiversity associated with water, something that is vital with the RAMSAR and SPA designation of the borough's reservoirs.

5m. Please tell us what you think about our approach to historic environment issues.

This does not directly affect Spelthorne.

6. Having considered everything you have read, do you have any further comments in relation to our proposals for the expansion of Heathrow?

The consultation acknowledges that it does not deal with a number of issues which will impact on the borough of Spelthorne: Flight paths, runway modes, baggage, park and ride, public transport interchange, landscape mitigation, temporary construction, displaced uses. This is a concern as it does not set out the true picture in terms of the potential impact on the borough. The borough must reserve its position to come back in future on these points once we have sufficient information on which to judge the impacts. HAL must consider how they are best able to do this before the statutory consultation on the 'chosen preferred option' later on the year.

There is a proposal to increase the limit on the numbers of flights per annum by 25,000 flights per year immediately following the DCO application through new procedures and efficiency procedures. It states that "we will only include these new flights in our

application once we have consulted on a robust plan to manage the potential effects of noise, AQ and airfield operations". It is not clear whether this 'consultation' will be part of the DCO consultation process or separate.

The Emerging Plans document is currently quite vague about what will be in the DCO application, e.g. there is discussion about an opportunity to expand the role of Hatton Cross as a southern gateway to Heathrow (through the introduction of more services, better interchange and enhanced passenger facilities); and there are statements that the master plan is to help major partners deliver a modernised efficient cargo village on the airport. For both it is unclear as to whether they are in the red line for the DCO or whether they are additional to the HAL expansion project.

7. Please tell us your views on this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and feedback form etc.).

A lot of the information is generic, quite broad and high level and does not enable the Council to comment in detail on a number of issues which are critical to the borough and its residents. The Council has highlighted throughout this response where additional information is required before we are in a position to make firm comment.

## AIRSPACE CONSULTATION

1. When designing airspace, Heathrow should:

- a) Minimise the **total number** of people overflown, with flight paths designed to impact as few people as possible
- b) Minimise the number of people **newly** overflown, keeping flight paths close to where they are today, where possible
- c) Share flight paths over a wider area, which might increase the total number of people overflown but would reduce the number of people **most** affected by the flight paths as the noise will be shared more equally.

Please provide any comments you have on the flight paths

To a large degree the 'design principals of airspace' above are pre-governed by the Airports Commission and the CAA and set down in statutory provision.

While Spelthorne supports reducing the number of people overflown by aircraft, insufficient information has been provided to enable a preferred option to be selected; as such the information held in the responses cannot be relied upon. In order to make an informed response or choice, information needs to be provided that answers the question "what quantifiable difference will each option make"?

- What are the impacts of the intensification proposed by options A and B (i.e. how many flights, what frequency, and what noise levels are people likely to experience).
- Likewise for the option C, how many people are likely to be overflown, how frequent and what noise levels are people likely to experience.

As an aside, if option C (i.e. to have a higher number of disperse routes thereby reducing the intensity of the flyovers) is employed, it should be ensured that HAL continues to work to reduce the noise and the impacts of aircraft from Heathrow. Further Spelthorne would expect noise levels down to 51 dB(A) to be properly assessed as the LOAEL for daytime noise from airborne aircraft and fully taken into account for the airspace design.

Given the scale of the Heathrow expansion project it is surprising that HAL does not yet have any information about the impacts of options which would assist responders to make more informed and therefore reliable choices. This lack of information can only impact on the responses being put forward to this series of questions on the design principals and the value of the consultation with the public, because the responses cannot be relied upon to inform HAL in their design.

The growth of noise issues along the Compton route resulting from the introduction of larger and heavier aircraft should have been identified much earlier and steps taken to mitigate the impacts. Going forward, it is likely that similar growth problems will arise as time progresses and aircraft technology changes and/or flight paths become more congested. Spelthorne expect the design and application of an effective noise envelope to anticipate and identify growing problems and mitigate these. Spelthorne would expect HAL to review Heathrow's flight paths on a regular basis, and earlier if growing noise problems are identified.

2. When designing airspace, Heathrow should:

- a) prioritise routing aircraft over urban areas, recognising that urban areas have higher noise levels
- b) Prioritise routing aircraft over rural areas where fewer people live

Please provide any comments you have on overflight of urban or rural areas

Again 'design principles of airspace' above are pre-governed by the Airports Commission and the CAA.

The concept of a noisy urban environment being better able to absorb aircraft noise than a rural one is accepted; likewise the need to have rural areas remain quiet thereby providing a retreat from the noisy urban environment. That said, there is also the recognised need to reduce urban noise due to the acknowledged impacts on people's health and well-being caused by high levels of environmental noise.

Insufficient information has been provided to enable an informed choice to be made. Information needs to be provided that answers the question "what quantifiable difference will each option make and in what circumstance?"

Spelthorne would expect noise levels down to 51 dB(A) to be properly assessed as the LOAEL for daytime noise from airborne aircraft and fully taken into account for the airspace design. See comments re question 1 above

3. When designing airspace in urban areas, Heathrow should:

- a) Prioritise routing aircraft over parks and open spaces rather than residential areas
- b) Prioritise routing aircraft over residential areas, avoiding aircraft overflight of parks and open spaces

Please provide any comments you have on parks and open spaces in urban areas

See above

4. When designing airspace, Heathrow should:

- a) Design flight paths that prioritise the reduction of aircraft noise for local communities over those that reduce fuel burn and emissions\*

b) Design flight paths that prioritise a reduction in fuel burn and emissions\* over those that reduce noise for local communities

Please provide any comments you have on noise and emissions\*:

One option is not necessarily the best option for all routes. There needs to be a compromise and sufficient benefit between the two options to ensure that the most beneficial option is selected

5. In order to deliver any of these design principles, all aircraft will need to be equipped with the latest technology. We will not design flight paths to accommodate aircraft with older navigation technologies and there may be parts of the design where aircraft with the highest specification of navigation technology have an advantage.

Please provide any comments you have on technology and innovation

The introduction of routes designed to a minimum Performance Based Navigation standard which can only be achieved by modern (or adapted) aircraft would be acceptable. Older aircraft are noisier and more polluting.

6. Heathrow has made good progress over the last few years in reducing the number of late running flights that operate from the airport and, with expansion, we have committed to a six and a half hour ban on scheduled flights in the night period (sometime between 11pm and 7am).

However, some aircraft will need to use Heathrow late at night or early in the morning: what key principles should we apply to the design of flight paths for arrivals and departures during these times? (You may like to consider the design principle options set out in Questions 1-5).

Please provide any comments

HAL recognises the significance of health (and other) impacts caused by sleep disturbance (as does the Airports Commission). Spelthorne agrees that night flights should be banned. They should not only be banned, but strict penalties must be imposed for any breaches.

Within the consultation HAL is committing to banning night-flights, but also states that “it will encourage only the newest and quietest planes to fly in and out of the airport, particularly during the night period”. While Heathrow operates a voluntary agreement that no aircraft should land before 0430, between 0430 and 0600 an average of 16 planes per day can land.

From October 2018 the Government is reducing the quota count noise limits to take account of quieter aircraft. Following Heathrow’s expansion it must be ensured that Heathrow’s noise quota limits continue to be sufficiently restricted to bring about a reduction in night time noise disturbance to residents during the core night period beyond the 6.5 hours. Spelthorne would expect HAL to take into account resident’s views when setting the times within which aircraft will not be permitted to fly

Spelthorne would expect that residents receive their full share of the benefits of quieter aircraft/airport technology and systems.

7. Please provide any other comments you would like to make about our approach to airspace change, and let us know if there are any other design principles we should consider.

Please provide any comments

No additional comments to make

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## **Heathrow - Land Use consultation response from Spelthorne Borough Council**

### **1. Overview**

- 1.1 In this response to the land use proposals within the consultation, we will provide comments on each of the sites located within the Borough of Spelthorne. However, there are general comments we wish to make that cover the broader land use strategy and are not site-specific. These general comments are covered in our main response to the consultation.

### **2. Green Belt**

- 2.1 Much of the northern part of our Borough is located within the Green Belt and all of the sites assessed in Heathrow Airport Limited (HAL's) land use strategy fall within this designation. In November 2017, Spelthorne Council published a Green Belt Assessment (GBA), produced by consultants from Arup. This is an important part of our evidence base as we progress towards the adoption of a new Local Plan for the Borough. It assesses how well the Green Belt is performing against the purposes set out in national policy. It is disappointing that the individual site schedules produced for the land use consultation material do not include reference to the GBA and instead rely on HAL's own assessments on the performance of certain sites. It would be useful to understand the methodology HAL used in assessing Green Belt parcels against the five purposes and how that aligns or not with the methodology used by our consultants.
- 2.2 The Green Belt is of vital importance to our Borough and provides a buffer not only to the sprawl of London but also to the airport itself. Whilst residents already feel 'hemmed in', this band of Green Belt currently provides a 'degree' of respite. Some have been previously developed and have ongoing established uses that erode the amenity they offer beyond the five Green Belt purposes but many provide open, accessible land welcomed by residents, with valuable biodiversity and nature conservation habitats.
- 2.3 Inappropriate development in the Green Belt will require Heathrow to make a case for Very Special Circumstances to demonstrate that the significant harm will be clearly outweighed by the benefits of the expansion. Heathrow will also need to consider not only the harm to individual sites within the Green Belt but also the effect on the wider, strategic arc of important green spaces that can be traced from the airport through to Epsom and provides a narrow break between the built form of outer London and the Surrey towns of Ashford and Sunbury within Spelthorne and beyond into the neighbouring boroughs of Elmbridge and Hounslow. Our GBA concluded that this strategic area of Green Belt was strongly performing by acting as a vital barrier to potential sprawl from the Greater London built up area and establishing important gaps between London and a number of Surrey towns. In making the case for development in the Green Belt, Heathrow will need to consider this strategic

impact very carefully and look at the impact on the wider band beyond the borough boundary.

- 2.4 If parts of the Green Belt are to be lost to airport related development, the Council will expect all new buildings to be of the highest quality design and with landscaping integral to the development. It is noted that there are ranges of options for the sites identified in the land use strategy, so for areas such as Stanwell Moor and Stanwell (which are significantly impacted) there is a very clear need to balance built form with areas required for enhanced landscape and biodiversity. It is imperative that any landscape benefits are secured through the acquisition of such sites by HAL so that enhancements are within their control and can be delivered and maintained. The Council is aware that not all of the commitments to landscape improvements offered during the Terminal 5 development could be fulfilled due to the reticence of landowners and we expect this situation to be avoided in future. Residents need to have absolute confidence that HAL is able to deliver what it promises and not 'fall short'.

### **3. Local Plan considerations**

- 3.1 Spelthorne is in the process of producing a new Local Plan for the Borough and is currently reviewing and updating its evidence base prior to initial public consultation in spring 2018. From our early findings, it is clear we have a significant challenge in order to meet our housing, employment and infrastructure needs within the urban area. Our Borough is heavily constrained by Green Belt (65%) and areas of high flood risk. Options for meeting our needs are likely to include building at considerably higher densities and potentially releasing some weaker performing Green Belt sites.
- 3.2 This is a challenge that all authorities affected by Heathrow will be facing. The land that is proposed to be used for airport related development to support expansion proposals will only reduce our potential supply further, especially the weaker performing Green Belt land in Stanwell. We would wish to work closely with HAL to consider all options for exploring mixed use development and maximising possible land swap opportunities so that some of these identified areas for development, together with any other land HAL may be able to offer, can also support the aspirations of our Local Plan to meet our own needs, not solely for the benefit of the airport.

### **4. Individual site assessments**

- 4.1 Comments made on individual sites should be read in conjunction with our responses to the main consultation.

## **5. E3: Land at London Road/Short Lane**

- 5.1 The site falls within a strongly performing Local Area within our GBA. Consideration will need to be given to adjoining Green Belt land within Hounslow borough (immediately to the east) and the wider impact on the strategic swathe of Green Belt in this location. It is noted that Hounslow have shown this site for potential release from the Green Belt (which will affect the role of this site in Green Belt terms if it is removed). It provides an important 'green' resource, however there are other areas of green infrastructure around which could and would need to be managed and improved to help offset this loss.
- 5.2 There would be no overriding objection to the use of this land for airport related industrial development, subject to a robust Green Belt case to demonstrate Very Special Circumstances that would outweigh the harm, and ensuring that noise, traffic and air quality were appropriately addressed. We recognise that a development of this nature for commercial/industrial purposes has the potential to bring additional jobs into the area, which would represent an economic benefit to the Borough.
- 5.3 This site is somewhat remote from residential properties. Noise pollution will increase depending on the use of the site, but if this is managed carefully and correctly with regards to local residents and the community centre the effects could be minimised. Consideration must be given to noise from potential 24hr movements if used for ancillary airport or industrial uses.
- 5.4 Lighting impacts would need to be considered very carefully and fully mitigated. In terms of biodiversity E3 is one of the development sites of relatively low value if compared for example to F2. No increase in flooding risk is envisaged.
- 5.5 Access to this site from the south west along the A30 from J13 of the M25 motorway comes through two of the Borough's air quality hotspots: the Crooked Billet, Staines junction and the Stanwell New Road/ Town Lane, Ashford junction. Concerns about air quality impacts from the quarrying (and refilling) of this site were raised due to HGVs hauling the mineral to Hengrove Farm for processing. Permanent development of the site for ancillary airport uses or warehousing would have a detrimental impact on air quality off-site in those hotspot areas. The significance of this would depend on the scale of the development and the number and type of resultant vehicle movements.
- 5.6 A firm commitment is needed to relocated the community centre or be accommodated to the satisfaction of its users (the replacement must be 'like for like' as an absolute minimum). We have not identified any significant environmental constraints affecting this land that would require remediation but it is an Area of High Archaeological Potential and survey work would need to be undertaken.
- 5.7 This land is due for aggregate extraction so at the point of Heathrow potentially acquiring the site it will be an inert landfill. As a modern site, land

contamination should not be an issue from the landfilling, although there will be some constraints in the geotechnical design of a development. There could be some localised impact of land contamination from off-site sources:

The site is adjacent to an historic landfill to the north, Land at Short Lane, which is owned by the Council. This is known to have some land contamination issues with soils and ground gases, and could have some localised impact on the E3 site, but should not prevent redevelopment.

Groundwater monitoring at the Short Lane Landfill indicated some impact from hydrocarbons, with the adjacent Heathrow Oil Terminal as a potential source.

There are two further historic landfills immediately south of the A30 which could still be generating some ground gas.

- 5.8 This site adjoins E1 Mayfield Farm within the borough of Hounslow. It has been noted within its site assessment that it could accommodate the replacement Immigration Removal Centres. The location of this site is in close proximity to Spelthorne's borough boundary and our nearby towns of Ashford and Staines upon Thames, which may experience impact from the use. If this site were selected, further information would be required as to the process for those who have left the centre and whether there would be housing and homelessness obligations for nearby authorities.

## **6. E4: Land at Bedfont Road/Long Lane**

- 6.1 Whilst it is acknowledged that the site comprises a mix of open space, industrial and commercial uses, it has been scored as strongly performing within our GBA. The strategic impact of developing this site would need to be considered in addition to individual performance of the site itself, although it is noted that it adjoins a 'finger' of non-Green Belt beyond the borough boundary with Hounslow.
- 6.2 Parts of the site are likely to be contaminated so its development would secure the necessary remediation. The northern half of this site is the historic Mentone Farm landfill. The northern half in particular has a long history of non-conforming uses which have further impacted on the land quality. Available information about land conditions indicates that there could be some localised heavy contamination. However development of the site offers an opportunity to deal with the contamination and provide environmental improvement. While the site remains as undeveloped Green Belt any clean-up of the land is unlikely to occur. Any redevelopment of the site will need to consider potential impacts on off-site land uses. For instance, many of the modern developments along Long Lane have incorporated ground gas protection measures, but not all. Any redevelopment of the site could potentially change any ground gas regime, increasing risks to nearby properties which would have to be mitigated against.

- 6.3 There are residential properties within close proximity of the site and full consideration must be given to how these residents will be compensated or the effect on their homes mitigated, particularly for noise from the potential of 24hr movements from this site if used for ancillary airport, cargo or industrial uses. Lighting impacts would need to be considered very carefully and fully mitigated.
- 6.4 This is already a very busy urbanised and commercial area, with a fragmented natural environment which is relatively low in biodiversity. In terms of visual amenity, it would very much depend on whether site E3 is developed. If it is then the area will have very little green environment but if only E4 was to be developed then E3 would provide sufficient green space to perform green space functions and compensate for the loss of E4. There is also green space to the west of Long Lane which if left untouched would help compensate for the loss of site E4. No increase in flooding risk is envisaged.
- 6.5 The potential use for cargo facilities is clearly the most practical form of airport related development, given the proximity to existing cargo premises such as dnata. We recognise that increasing cargo floorspace, to cement this location as a hub, makes ultimate sense for Heathrow and would bring economic benefits in terms of employment. We do not consider the site suitable for other uses.
- 6.6 Any development would need to ensure appropriate HGV routing through Long Lane, Short Lane and Stanwell Village (and any infringements rigorously enforced). The site does benefit from good road links to the Southern Perimeter Road from the north east approach.
- 6.7 The boundary to this site requires further clarification. There is a 'notch' removed at the top of this site and we would question why this has not been included.

## **7. F1: Stanwell Moor Road, Horton Road and Airport Way**

- 7.1 This site is a former restored minerals site and is located within an area of Green Belt considered to be moderately performing in our GBA. It also includes a recreation ground and a well-used and managed village hall - amenities which are of considerable value to the community of Stanwell Moor. The types of development proposed for this site include hotels and offices. These must be designed to the highest standard and include landscape features to integrate buildings into their surroundings, creating an attractive setting that would mitigate the impact of development.
- 7.2 The other proposed use of this site is for the relocated Immigration Removal Centres. A development for this purpose would require a functional design with high-level security features and extensive hardstanding. In view of the very considerable effect on the Stanwell Moor community, this is an unacceptable use of this site and the Council very strongly objects to its relocation here. Such a use would be totally incompatible with the high quality

offices and hotels (and alongside one of the three proposed locations for a new or expanded terminal).

- 7.3 In terms of the potential locations for the Immigration Removal Centres, site 'A4' at Holloway Lane in West Drayton is a significantly larger site, and the facility could be accommodated further away from existing residents than is possible on this site. In addition that site has the added benefit of the M4 which would act as an effective barrier from West Drayton itself. The London Borough of Hillingdon also currently house the two immigration centres associated with the airport, and have the infrastructure in place to deal with issues arising. Mayfield Farm (site E1) which has also been identified as a possible site for the centres also has the benefit of being bordered by Staines Road and the Great Western Road (thereby limiting the impact on nearby residential properties).
- 7.4 Rather than considering an unneighbourly use in such close proximity to the village as a whole and individual properties, consideration should be given to whether the site could be used for open space, balancing ponds or leisure facilities for nearby communities to offset the harm caused by the potential land take in the Stanwell Moor and Stanwell areas. Alternatively, a mixed use development should be pursued that can bring benefits to the community as well as supporting the needs of the airport. Any leisure facilities would need to meet the needs of the community, with capital and revenue costs (in perpetuity) being borne by HAL.
- 7.5 Being within the noise contours, HAL must ensure that any development (such as hotels or offices) has sufficient noise mitigation measures built in. Development should not result in any adverse impacts on nearby residential properties from noise from the development itself. Lighting impacts would need to be considered very carefully and fully mitigated. This will apply even more so in relation to the Immigration Removal Centres.
- 7.6 Any development would require a significant buffer to effectively protect residential properties to the south and west.
- 7.7 We have concerns about the air quality levels for eventual occupiers of this site. These levels are likely to worsen with the introduction of additional vehicle movements into the area. Access and sustainable transport will need to be carefully considered if this site is to be developed. The Council's latest AQ modelling work (2015) would suggest that the proximity of the A3011 Airport Way and the Heathrow boundary creates an air quality shadow over the northern half of the F1 site, with levels likely to be above the EU compliance limit. Reconfiguration of J14 and the southern/western approach to Heathrow under expansion is likely to make this worse. Development of the site for offices or hotels will require detailed air quality assessment and potentially mitigation of air quality impacts. An Immigration Removal Centre which accommodates residents on a 24/7 basis for a period of more than a year (in most cases) would be a location where the annual mean air quality objectives would apply. This would introduce new residents into an area of

poor air quality which is another factor making this site unsuitable for the Immigration Removal Centres.

- 7.8 This site is the historic landfill of Spout Lane Tip. There is some limited information about the nature of tipping and current shallow ground conditions on the west of the F1 site. This indicates that serious contamination of the site is unlikely, but a comprehensive contamination assessment will be appropriate for any redevelopment of the site.
- 7.9 The site is moderately performing Green Belt and is bordered by a RAMSAR and SPA site below (King George VI Reservoir). The effect on biodiversity will largely depend on what the site is to be used for. The reservoir is hugely important for over-wintering birds and therefore anything that provides disturbance to the reservoir would be problematic. This could include building works as birds may be put off using the area due to the increase in human activity. If the site is used for offices or hotels as suggested it is unlikely there will be a huge long term effect on the reservoir and its bird life. There will likely be short term effects whilst building work is happening but the birds should adapt to this and continue to use the site in the longer term. However, the effects on visual amenity will be significant. The site acts as a buffer between the airport and Stanwell Moor and developing office blocks or hotels will permanently alter the landscape and remove a very important piece of green infrastructure. There will also be an increase in noise pollution and general footfall in the area and this will probably affect wildlife. These combined effects make this a difficult site to develop from a nature conservation point of view and if it were to happen there would have to be extensive mitigation for the reduction in Green Belt and open space functions.
- 7.10 F1 is also mentioned as a possible temporary construction site. We would prefer this site to be used temporarily as opposed to being permanently developed but even temporary work could have a detrimental effect on biodiversity and Green Belt functions.

## **8. F2: Site bounded by Southern Perimeter Road, Park Road and Stanwell Moor Road**

- 8.1 This site is 'strongly performing' as assessed within our GBA. It is also a safeguarded minerals and waste site where restoration has been significantly delayed by the operator and recycling operations have been expanded without consent but now authorised by a new 10-year permission. The creation of a new defensible boundary to the contiguous Green Belt to the south would be integral to the consideration of Very Special Circumstances.
- 8.2 The F2 site boundary does not include the whole minerals and waste site and the area to the south adjoining Park Road, which is designated as a Site of Nature Conservation Importance (SNCI), forms part of the area that is subject to detailed restoration proposals which have not yet been implemented. These are linked to the recent planning permission for recycling operations. If the site is to be used for airport related development it is essential that the site

is treated comprehensively so that the benefits of the parkland restoration with public access are delivered in a timely manner and not further delayed by uncertainty. It is imperative that these landscape benefits are secured through the acquisition of this site by HAL so that enhancements are within your control and can be delivered and maintained. A **map is attached** showing the revised boundary.

- 8.3 There are likely to be land contamination issues with this site. This site is three historic landfills Stanwell I, II and III. The eastern end of the site is the only non-landfilled area. There was formerly a large pond at the extreme eastern edge which may have been subject to filling or levelling, being no longer present. The majority of the site has been authorised to accept 'inert' wastes – albeit that the definition of what constitutes inert wastes has changed greatly since the 1960s. The NW corner of the F2 site (250m x 100m – 2.5 ha) accepted Class I, selected Class II and Class III wastes tipped into engineered cells. Class I materials are the standard 'inert' wastes, i.e. materials excavated from land in its natural state; builders rubble, brick and hardcore; & clinker & ashes. The restricted industrial wastes (Class II) were to be limited to cement, plastics, timber, rubber, glass, metal swarf. The Class III wastes were macerated/ pulverised household wastes & Civic Amenity refuse, office, shop and supermarket waste. Therefore redevelopment of the NW corner of the site may be more constrained by the nature of the wastes and engineered landfill cells. The remainder of the site should be low to moderate risk of some contamination of soils/ groundwater and low risk for ground gases. There is an archaeological feature on the open field that wraps around Lowlands Drive.
- 8.4 We are concerned about the impact on air quality, particularly if a car park or lorry park is to be included, bearing in mind its immediate proximity to residential properties to the south. This overlaps with concerns over the surface access strategy and the need for sustainable transport to reduce vehicle movements. Access to any uses at this site would need to be off the A3044 Stanwell Moor Road or the Southern Perimeter Road as access from the south would be unacceptable in highways terms, and detrimental to local air quality from vehicle movements.
- 8.5 As with site F1, the Council's latest AQ modelling work (2015) would suggest that the proximity of the A3113 Airport Way and the Heathrow boundary creates an air quality shadow over the northern half of the F2 site, with levels likely to be above the EU compliance limit. Reconfiguration of J14 and the southern/western approach to Heathrow under expansion is likely to make this worse. Development of the site for car parking, hotels and offices would bring vehicle movements and poorer air quality closer to existing residential areas. The National Air Quality Objectives for annual mean concentrations of pollutants do not apply at offices, places of work or hotels (unless there are permanent residents), but there would still need to be a detailed air quality assessment and potentially some limited mitigation of air quality impacts (e.g. mechanical ventilation, careful siting of intakes, screening barriers).



- 8.6 The visual impact of any development, especially a multi-storey car park, requires very careful consideration as to how it is screened from nearby residents. If such uses are accepted, we will expect them to be designed to the highest standard. Noise pollution arising from new development would need to be prevented or sufficiently mitigated. Lighting impacts would need to be considered very carefully and fully mitigated. If the Oaks Road open space is lost as part of any development, an enhanced open space would be required in return. A significant landscape buffer to protect residential properties to the south would be a pre-requisite if any development were allowed.
- 8.7 This is a strongly performing Green Belt site and buffer zone between Stanwell and the airport. If F1 and F2 were both to be developed there would be very little Green Belt left in the area, visual amenity would be hugely affected and human disturbance would increase significantly. On top of this site F2 contains a SNCI, a site that should be protected. This SNCI is Wetland habitat and is part of the Surrey Biodiversity Action Plan providing possible habitat for species such as Reed Bunting and Cetti's Warbler. Another SNCI is located immediately south of site F2. This woodland area is likely to be affected by any work and increased human disturbance. The SNCI is Staines Reservoir, part of the RAMSAR and SPA site that may also be affected by the increase in footfall on this site. Heavy machinery and associated work could affect migrating and over-wintering birds and put them off visiting and using the reservoirs although there is insufficient information to judge the impact at this stage. It is suggested that if F1 or F2 were to be developed that F1 is the preferred option due to the SNCI's presence in and around F2. If both areas were to be developed the increase in noise pollution, effect on visual amenity and loss of biodiversity could be deemed too great.
- 8.8 If the site is developed for airport support facilities (we acknowledge that it could bring employment and economic benefit to the area) the Council would require significant compensation elsewhere in the vicinity to provide for recreation and biodiversity.
- 8.9 F2 is mentioned as a possible temporary construction site. We would prefer for this site to be used temporarily as opposed to being permanently developed. Even temporary work could have a detrimental effect on biodiversity and Green Belt functions. F2 should be avoided if possible due to its higher biodiversity value.
- 8.10 The creation of a 'gateway' to the airport on this site raises wider concerns. This Council has persistently requested easier access to the airport for its workers who live to the south. However, introducing passenger parking here with access to the airport has potential to wreak havoc on the Stanwell Moor and Stanwell area and beyond, with passengers parking instead on the local roads to avoid car park charges. In conjunction with the surface access strategy, considerable thought needs to be given to how this would be mitigated. Introducing controlled parking zones (at Heathrow's expense) is deemed the only effective solution (as is the case in parts of the London Borough of Hillingdon close to the airport). A **map** has been provided as part

of the Council's overall response to the consultation setting out the boundary of the CPZ which would be required.

## **9. F5: Site to east of M25 and west of Stanwell Moor (Hithermoor)**

- 9.1 This site is not included within the appendix of sites considered for airport related development but is referenced on Figure 16.5 Potential Construction Sites within the emerging plan document. The site is located within moderately performing Green Belt. It is an operational minerals and waste site with detailed restoration plans and completion required by 2023. The site is likely to be the location of any minerals processing plant in the event that planning permission is sought for the extraction of minerals from King George VI Reservoir.
- 9.2 The current and longstanding restoration proposals promise the delivery of high quality landscape with biodiversity areas complementing the natural areas of Staines Moor and the River Colne and with extensive public access. This site is an important part of the Colne Valley Park.
- 9.3 We agree that the site does not have development potential although there could be benefits in retaining the existing recycling plant area for the future, particularly during the construction phase of the airport expansion. Any such extension of the use would need to be considered in Green Belt terms and would need to provide considerable long term benefits for recreation, biodiversity and landscape enhancement over and above those already committed by the landowners.
- 9.4 Any development of the site could be constrained by land contamination. It is comprised of four historic landfills known as Land at Leylands Lane, Hithermoor Farm and Hithermoor Farm Area B and Lower Mill Farm. In reality the former three were all part of the same gravel extraction and infilling operation by Greenhams. The landfills were generally filled with inert materials from pre-1955 through to the late 1990s. Four putrescible waste engineered landfill cells were filled toward the south of the site between 1982 and 1989. The landfill cells were an engineering constraint during the Heathrow Airtrack proposal, and thus are likely to remain a constraint in any new Southern Rail Access proposal and any intrusive development of these areas of the site. Long-term ground water quality and ground gas monitoring data is available for the site. Available past monitoring results have found low levels, by volume, of carbon dioxide and no/ very low methane levels in the north of the F5 site, with more typical concentrations and ratios of landfill gases in the centre and south of the F5 site. Ground gas may be a constraint for any physical development on the site.
- 9.5 Only broad information has been provided on the types of temporary construction uses the site could accommodate. Details will be required in order to assess the impact on our communities of additional vehicle movements and access arrangements, in conjunction with a full method of construction strategy. It has been suggested that the site could accommodate

a temporary housing campus for construction workers. The issue of this type of use is discussed in the Overview section above but needs careful consideration to minimise adverse effects on the wider area. Noise impacts from construction vehicle movements and processing would also require mitigation (see detail in section 5 in the Council's main consultation response).

- 9.6 Part of the site has been identified as a potential route for Southern Light Rail access, including the light rail scheme that the Council is promoting. A park and ride has also been suggested in this locality. This needs to be factored into the future consideration of the site.
- 9.7 It is unclear why only the southern portion of this site has been identified within the emerging plans document rather than extending the potential boundary to the north. This land is more remote from the airport and has been regraded with clay soil to raise it higher than the land to the north.
- 9.8 As previously stated above, F5 is mentioned as a possible temporary construction site. We would prefer for this site to be used temporarily as opposed to being permanently developed but even temporary work could have a detrimental effect on biodiversity and Green Belt functions. F5 should be avoided if possible due to its higher biodiversity value.

**10. F7: Site to the north of Wraysbury Reservoir and to the south of Horton Road, bounded to the east by Wraysbury River**

- 10.1 Only the southern tip of this site is within Spelthorne. It has been scored as moderately performing within our GBA. The site is mainly within Slough and has a long history of unauthorised uses, particularly for lorry parking, although some within the Spelthorne area appear to have become established through lack of enforcement action. It is not known if any of the current uses within Slough have been authorised. However, it would be wrong to use the description of 'previously developed land' as defined in the NPPF.
- 10.2 As with all the sites, any development would need to be justified in terms of demonstrating Very Special Circumstances. Use of the site for further lorry parking or a more intensive form of development would need to take account of and enhance the setting of the Wraysbury River and the adjoining SSSI. The site could provide the opportunity for other landscape enhancement work arising from the expansion of the airport.
- 10.3 The site has easy access to J14 of the M25 and is likely to be attractive as a construction or freight consolidation site. There are no Spelthorne residents in close proximity to the site, albeit there are some Slough residents in the mobile home park to the north west of the site.
- 10.4 There is a possibility that this site could provide a north-south rights of way link from Poyle to Staines, particularly if the existing bridleway to the east of the M25 alongside Hithermoor Farm is lost for the Southern Rail Access

project. Maintaining a good quality cycleway link between Poyle and Staines is very desirable to ensure that cycling remains an attractive option for workers at Poyle and residents in the Poyle/Colnbrook area.

- 10.5 Goods vehicle uses of the site at F7 have been intermittently present since the late 1990s, and a covering of imported hardcore placed across the site. Land to the east of the F7 site is the Hithermoor Farm Area D Landfill. This extension to the landfill was granted planning permission in 1979/80 and filled with inert wastes in 1980 & 1981. The on-site uses and nearby landfill are unlikely to have led to serious widespread contamination of the site, and so it is doubtful that land quality would constrain the future use of the site.

## **11. NS7: Land south of Bedfont Road between Clare Road and Northumberland Close**

- 11.1 This site falls within a Local Area considered to be weakly performing against Green Belt purposes within our GBA. The site adjoins residential development to the west and in its north eastern corner but otherwise relates to the commercial development to the east. Its development for airport related commercial uses would not undermine the wider strategic function of the Green Belt nearby and could provide the opportunity for some extensive environmental enhancement for the benefit of the local community as well as further employment opportunities.
- 11.2 The impact on residential properties in close proximity would require careful consideration in terms of noise. Lighting impacts would need to be considered very carefully and fully mitigated.
- 11.3 Any development would need to ensure there was no inappropriate HGV routing through Long Lane, Short Lane and Stanwell Village. The site does benefit from good road links to the Southern Perimeter Road from the north east approach – as such any access should be from Bedfont Lane only. This larger area of commercial development would benefit significantly from improved access to the airport to reduce vehicular movements. There is suggestion about the possibility of a Pod/shuttle link between this off-airport cargo area and the on-airport cargo facilities to the north of the Southern Perimeter Road. The Heathrow consultation documentation indicates that moving goods to and from off-airport warehousing represents a third of all Heathrow cargo related trips, so there is very real potential for significant air quality benefits if such a low emission link was taken forward. These benefits are considered sufficiently great that such a link must be an integral part of the cargo solution for this area.
- 11.4 There is a track along the western boundary which would offer an off-road rights of way link to connect with an existing west-east footpath to the south of the site to increase pedestrian connectivity. Any development would require a significant buffer to protect residential properties to the west and school to the south.

- 11.5 The Council's latest AQ modelling work (2015) would suggest that there is likely to be an air quality hotspot at the junction of Bedfont Road and Northumberland Close – presumably due to the HGVs turning into the Blackburn Trading Estate (dnata premises). Development of NS7 site would increase the numbers of HGV trips through this junction and have a detrimental impact on air quality of residents of Northumberland Close. An air quality assessment would be required to consider the potential air quality impacts.
- 11.6 The site was within the curtilage of a former animals products factory, albeit the land does not appear to have ever been developed and there is no record of any structures across this area of the factory site. There was a site investigation of the land in 2013 pursuant to a proposal for construction of a warehouse on the site. The contamination testing did not reveal any elevated contaminants for a commercial end use. Low concentrations of carbon dioxide were monitored at the site. A moderate thickness of made ground was encountered at the site to depths of between 0.5 to 1.25m thickness, comprising greyish brown silty sand with rare fragments of brick and concrete. Based on the available information land quality is unlikely to be a constraint to commercial development of the site, though basic ground gas protection measures may be appropriate subject to further monitoring.

## **12. NS8: Land north of Long Lane recreation ground and south of Northumberland Close**

- 12.1 This site falls within the same local area of weakly performing Green Belt as NS7. It remains an isolated tract of Green Belt but together with the open space to the south provides a buffer to the commercial buildings further north. The site has potential for residential or commercial development but also provides an opportunity for landscape enhancement to provide a more effective buffer between the existing commercial and residential development. If industrial uses are proposed there is likely to be additional impacts from noise and light on nearby residential property.
- 12.2 This site was subject to an application for residential redevelopment and an Environmental Statement in 2007, with vehicular access off Long Lane. Access off Long Lane could cause significant detrimental air quality impacts for an industrial/ employment land use. Air Quality impacts would likely be significantly mitigated for Long Lane properties if access arrangements could be made as an extension of the Blackburn Trading Estate to the north – albeit this could exacerbate air quality impacts on residential properties at Northumberland Close as described under the NS7 site comments.
- 12.3 A site investigation was undertaken in 2007 as part of the Environmental Statement. This found that the majority of the site was overlain by topsoils over natural soils. Analysis of the samples collected did not identify contaminants at levels likely to constrain commercial/ industrial development of the site.

- 12.4 Any development would require a significant buffer to protect the school to the west and residents to the east. The recreational facility immediately to the south would require capital monies for upgrading and on-going revenue for maintenance to help mitigate and offset the impacts on nearby residents.
- 12.5 The impact on residential properties in close proximity would require careful consideration in terms of noise. Lighting impacts would need to be considered very carefully and fully mitigated.

### **13. Other sites**

- 13.1 Some sites are not included within the Emerging Plans document but have been discussed as part of dialogue with Heathrow Airport Ltd and the Heathrow Strategic Planning Group and are included below for completeness.

### **14. Site south of Horton Road and north of King George VI Reservoir**

- 14.1 This is a safeguarded waste management site identified in Surrey County Council's consultation draft Waste Plan 2017. It is the only permanent waste processing site in the area and has been identified as such within the draft Plan. Its loss would result in the challenging task of finding a suitable alternative site and we would prefer this use to be retained. It is also strongly performing Green Belt that would benefit from further landscape enhancement to its margins.
- 14.2 The site is bounded to the north and west by residential properties. These are very sensitive to odour issues, noise and vehicle movements from the site. Oak Leaf Farm, as the site is known, is a historic landfill known as Land South of Horton Road Landfill. Spelthorne has no records of what waste types were consented to be tipped into the landfill. Widespread serious contamination is unlikely and contamination is unlikely to constrain development, particularly in respect of any construction related uses.
- 14.3 We agree with Heathrow's assessment that this site has limited development potential.

### **15. Staines Moor**

- 15.1 Staines Moor is one of the most important areas in the Borough for biodiversity and recreation, together with its strongly performing Green Belt function. It is designated as a Site of Special Scientific Interest (SSSI) and Metropolitan Common, managed by the Borough Council in association with the Moormasters. We would strongly object to any built development of this site.
- 15.2 Although Heathrow acknowledges that this site does not have development potential, the assessment suggests that it could be suitable for landscape and

environmental enhancement. Whilst the land could be better managed in order to safeguard the site in perpetuity beyond the funding from the existing S.106 agreement with Bretts, it is not considered suitable for enhancement and is best left undisturbed. However, there could be potential for improvement around the boundary of the Common, possibly by way of improved pedestrian access and bridleways.

#### **16. Site to the south of London Road and east of Staines Cemetery (known as Hengrove Farm)**

- 16.1 The site falls within an area of strongly performing Green Belt. It is an active minerals site with processing plant to be used for 'as raised' minerals from Homers Farm. Temporary access is taken from the A30 for the mineral working but this would have to become permanent if the site were to be developed.
- 16.2 The site is to be restored to agriculture once the mineral operation has ceased and retained in the Green Belt. As such, it is not considered to have development potential.

#### **17. Other sites for consideration**

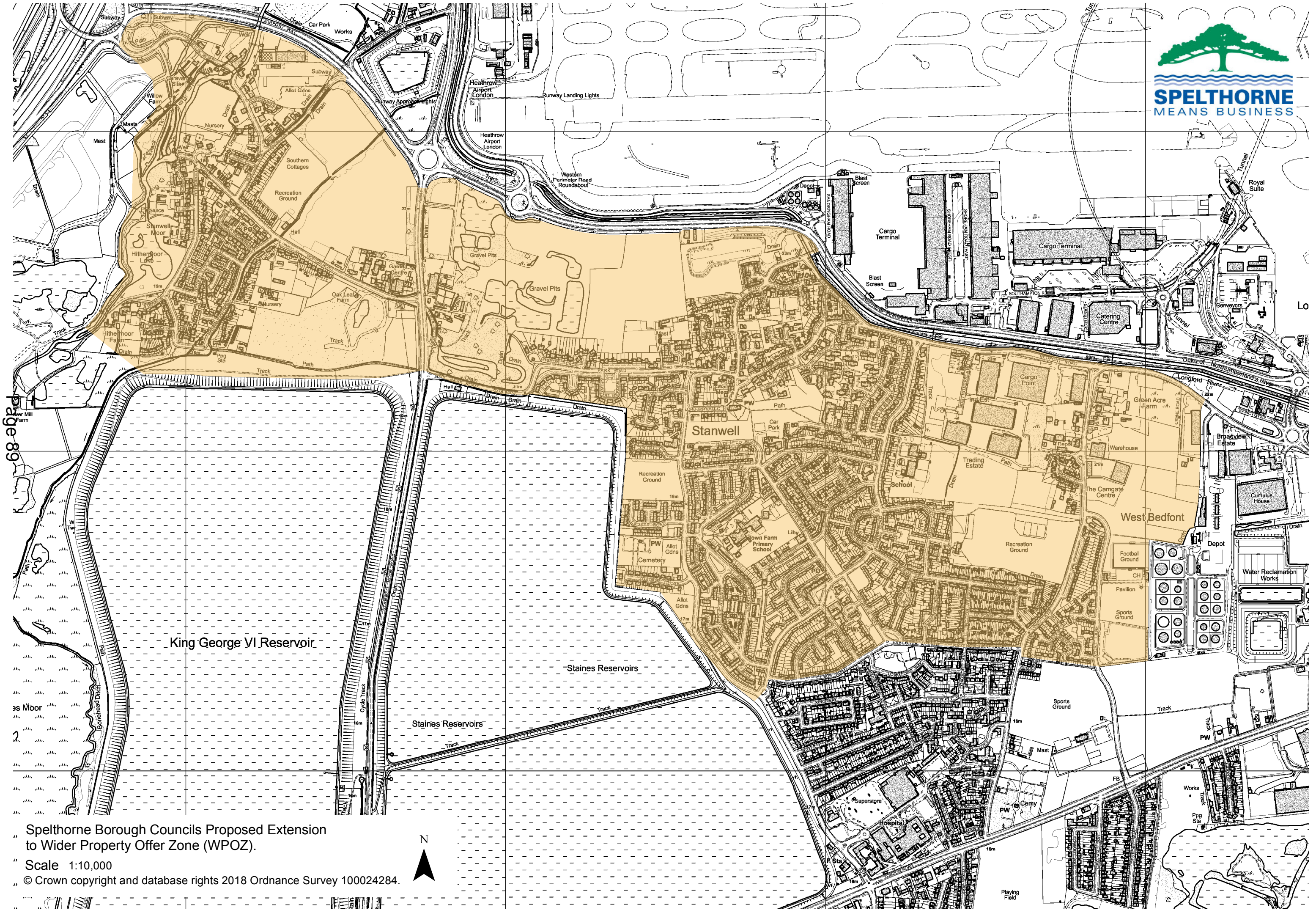
- 17.1 There are a couple of other sites which immediately adjoin a number of the sites referred to above. **A map** has been provided to indicate their location as part of the Council's overall response. We assume that they not been considered purely on the basis that they fell under the 2Ha threshold that Heathrow set. However, these parcels of land are intrinsically linked and either offer the potential to provide greater scope on a larger site to achieve a more comprehensive approach with a stronger landscaping setting or to provide greater environmental protection and enhancement.
- 17.2 The first site sits to the north of site E3 and south of site E4. It encompasses an area of land which lies immediately south of Ashford Football Club and would form a logical extension to the possible uses put forward for E3. Any development would need to be sensitive to nearby residential properties and access would need to be gained via site E3. Alternatively there may be scope to relocate and enhance the Football Club facilities onto this site and use the current Club site as a logical extension to site E4 (see attached plan).
- 17.3 The second site sits to the west of site F1 on the far side of Spout Lane. This is an allotment site (with a limited number of plots in use) but there is scope for these to be re-provided in the locality. This area (and possibly the site to the north which FlowerVision occupy) would either provide opportunities for airport parking or for open space or balancing ponds or for substantial landscaping to provide both respite for Stanwell Moor and also a suitable 'high quality' gateway entrance to the airport (see attached plan).

- 17.4 There is also a small area of land to the north of NS8 and to the east of dnata which would be logical to include within the site boundary of NS8 (see attached plan) in order to 'round off' this opportunity area.

## **18. Summary**

- 18.1 The impact of the proposed land use strategy on our communities to the north of our Borough cannot be overstated. Whilst the Council agrees that some sites may have potential for airport related development, a robust case to demonstrate that each of the sites can be justified in Green Belt terms is essential. The impact of development needs to be mitigated against and compensated for, not just on a site by site basis for individually affected residents but on a wider basis for the community as a whole. The airport expansion will reap significant economic reward for Heathrow and it is only right that this communicates into meaningful and enhanced benefits to Stanwell Moor, Stanwell and the Borough as a whole.

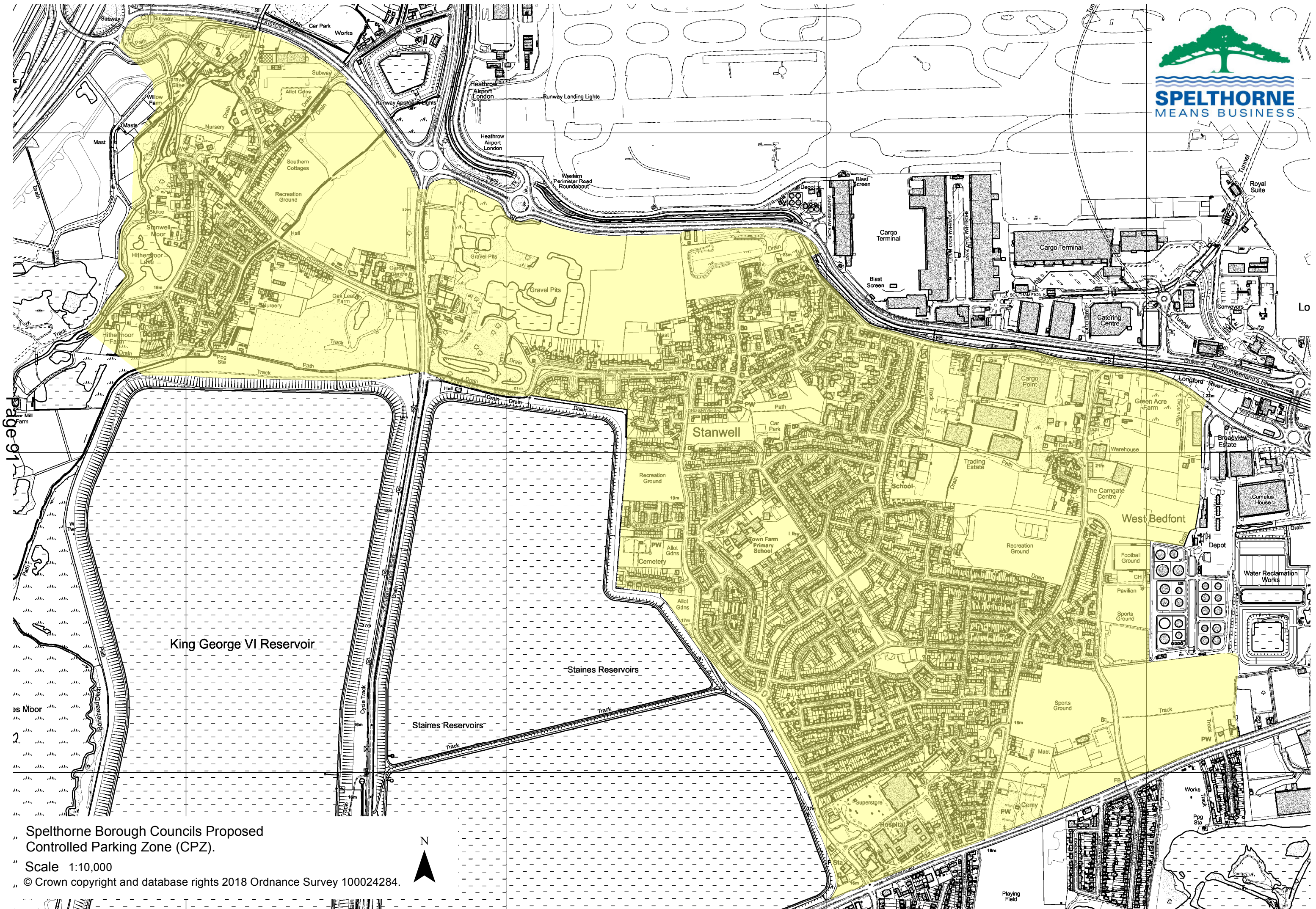






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Page 91

Spelthorne Borough Councils Proposed  
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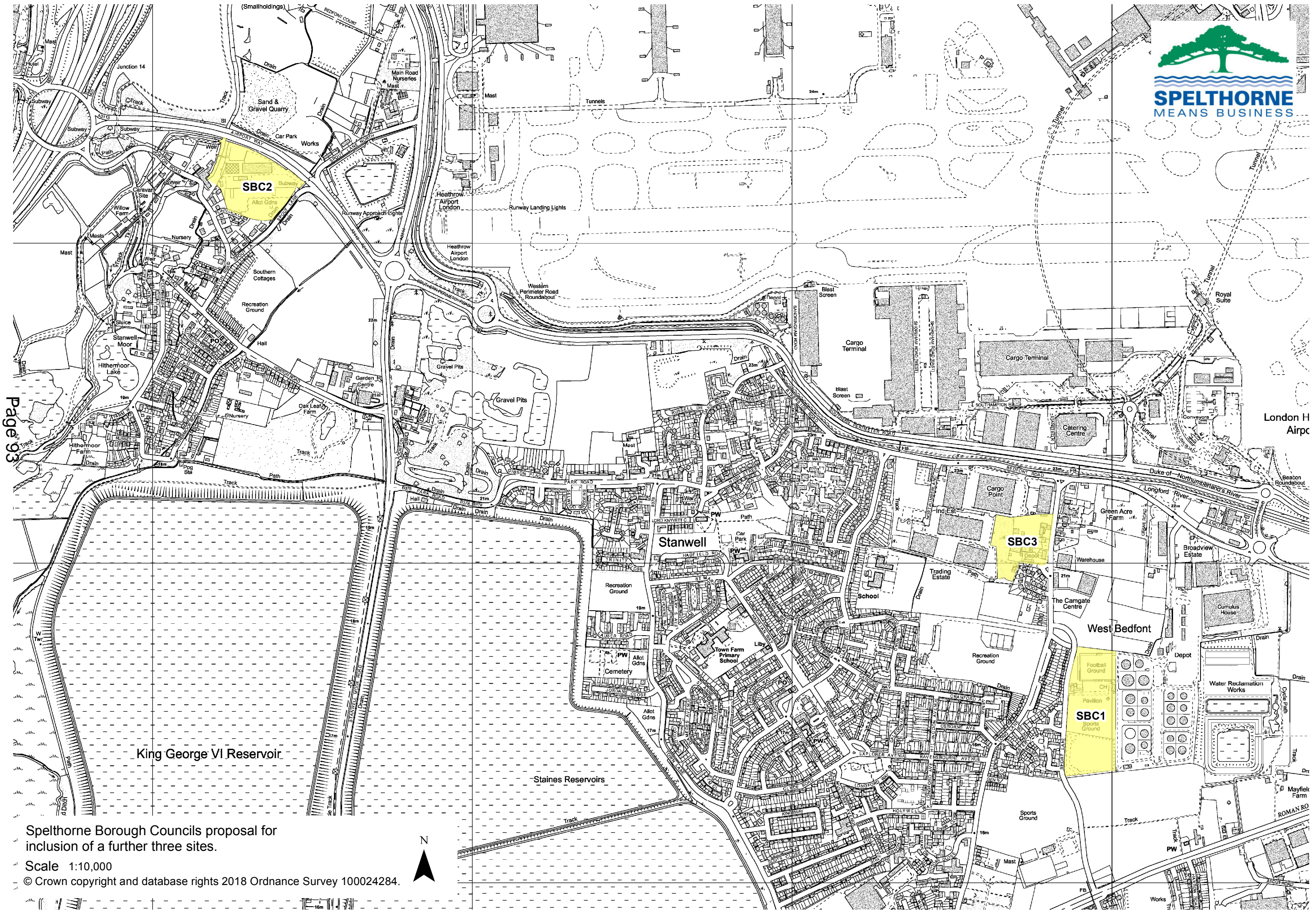
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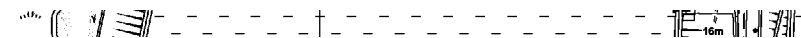
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Spelthorne Borough Councils proposal for inclusion of a further three sites.

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