

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 3rd 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 3rd 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 3rd 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 3rd 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 3rd 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 share 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