

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

### **1. Overview**

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

### **2. Green Belt**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **13. Other sites**

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

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

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

### **15. Staines Moor**

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

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

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

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

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

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

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

## **18. Summary**

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