

Slough Borough Council response to Airports Commission consultation

Questions inviting views and conclusions in respect of the three short-listed options

- 1 Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.
- 1.1 As a borough located in close proximity to Heathrow, Slough borough will experience impacts if any of the three shortlisted options are delivered. Both of the Heathrow options will result in a new runway crossing the borough's boundary for the first time, and will mark a step change in the relationship between Slough and Heathrow airport. The proposals will variously result in the loss of residential and commercial land uses and green space, with potential significant adverse impact on residents, the environment and the council's income.
- 1.2 Expansion at Gatwick, whilst minimising the impacts of additional capacity on residents around Heathrow could have adverse impacts on Heathrow. It could for example reduce the resilience of Heathrow, and also its ability to operate effectively as a global hub airport as there would not be capacity to expand the number of destinations served across the UK. This may reduce the extent to which the airport would serve the needs of the many national and international headquarters located in Slough and the wider Thames Valley region.
- 1.3 Changing land use would be one of the most significant impacts on Slough if either of the Heathrow short listed options were to be chosen. Both proposals bring part of the runway into the borough for the first time.
- 1.4 The following table sets out Slough Borough Council's comments on the two Heathrow runway proposals.

	Extended northern	North west
1 Dislocation of existing land uses	1.1 Greatest loss of residential properties, with 229 properties lost in Colnbrook with Poyle ward. Loss of commercial space in Poyle Industrial Estate (up to 215 businesses could be forced to relocate), much of which supports the airport. Re-routing of the M25 would also require the removal of Galleymead Road with around 46 business premises.	1.2 Minimal loss of residential premises but requirement to relocate Energy from Waste (EfW) plant and other commercial premises on Lakeside Estate. The EfW is an important local and regional waste management operation which generates power and heat for the local community, soon to supply the airport. It is an important element of the authority's ambition to become a zero landfill authority. This is an important part of the borough's waste management, and recognised by the Commission as being of 'regional importance'. Expect replacement at no additional cost to the authority, and no break in service. There are opportunities in the reprovision of the plant to upgrade and modernise operations.
2 Compensation	2.1 Fewer details available to assess the compensation package, although Commission suggests could be similar to HAL. The council	2.2 Generous offer to buy package but the authority would like reassurance that it would allow existing residents to relocate in the local area in like for like properties, and is concerned that

	requires the opportunity to comment at the point detailed proposals are developed for this particular option.	the total funding available for noise insulation is not sufficient to cover all those properties which require sound insulation. Special recognition should be given to the new noise which would affect new residents in Slough as a result of the this option, as this option does the most the alleviate noise impacts for areas to the west.
3 <u>Income</u> LA funding shifting from government grant to council tax and business rate income	3.1 Loss of substantial income from council tax and business rates which the council would expect to be compensated for. More than £8 million of business rates at risk on Trident, Britannia, Coln and Viscount Industrial Estates and McKay Trading Estate removed by the runway, and more than £1.25 million of business rates at risk on Galleymead Road as a result of realignment of the M25. Circa £300k loss of council tax income per annum as a result of 229 properties lost.	3.2 Loss of business rates due on Lakeside Estate more than £4.5 million, including Energy from Waste plant. Fear that waste disposal costs will increase if plant located further away. 3.3 As there is a requirement for a connection to Colnbrook by-pass from the south, a route skirting Poyle to the east would require removal of Galleymead Road with a loss of more than £1.25 million in business rates. An alternative solution would be the tunnelling of a southern access road alongside the M25, which is discussed in more detail in the answer to Q2, 4.5.
4 <u>Impact on borough boundary</u>	4.1 Slough is a small densely populated urban borough immediately to the west/north-west of Heathrow. Both proposals would require land take, and Slough Borough Council would resist very strongly any transfer of land to LB Hillingdon or any other borough. It is already almost impossible for Slough to meet housing demand due to a shortage of available sites, and pressure will increase due to the requirement to accommodate dislocated residential and business properties. The Commission estimates between 22,900 and 70,800 new houses will be required across fourteen boroughs, and while we do not agree that the requirement for new homes will be of this magnitude it is nonetheless likely that expansion at Heathrow will drive housing demand. It will be almost impossible for Slough to accommodate additional housing need, especially if the borough reduces in size due to loss of land for airport expansion and this is not compensated in some way by providing compensatory land. As the Commission notes there would be a need to take land out of the greenbelt. There will also be a requirement for additional community facilities which will be challenging to provide with available land so limited.	
5 <u>On-site development</u>	5.1 Proposal has limited capacity for commercial space as assumed this will be provided elsewhere. SBC would welcome the opportunity to be involved in the allocation of these ancillary uses.	5.2 SBC is concerned that commercial, industrial, retail and hotel capacity provided at Heathrow may compete with land uses on Poyle Industrial Estate, the centre of Slough and Slough Trading Estate. Careful consideration must be given to the provision of these facilities on-airport to ensure they complement, and not compete with the local area
6 <u>Affected communities</u>	6.1 In-line runways would limit the number of people newly	6.3 A runway further north would expose a substantial new population in

	<p>affected by noise with most flights following existing flight paths to the south of Slough, although there will be an increase in noise exposure to the residential population in the southern wards of Slough which is currently experiencing housing growth. Noise could however be more intense for those under existing flight paths. A substantial noise insulation package would be required for any newly affected households or those experiencing an increasing intensity of noise</p> <p>6.2 Concern that the reduction of households in Colnbrook with Poyle would reduce the viability of facilities, shops and schools, and harm community life. Pippins and Colnbrook C of E Primary Schools and Vicarage Way Children's Centre likely to experience significant noise disturbance as a result of this proposal.</p>	<p>Slough at the western end of the runway to noise. Slough would experience some of the greatest knock on impacts of the increase in aviation noise. A substantial noise insulation package would be required to rapidly bring all eligible households up to the required standard, and similar measures would also be required for public buildings, especially schools, as well as ongoing costs associated with maintaining an ambient learning environment in classrooms.</p> <p>6.4 This proposal reduces the total number of people affected by aircraft noise, but only by subjecting more communities, including newly affected Slough residents, to more aircraft noise. Mitigation should therefore be weighted towards those newly affected in this way.</p> <p>6.5 Pippins and Colnbrook C of E Primary School and Vicarage Way Children's Centre likely to experience significant noise disturbance as a result of this proposal.</p>
7 Noise	<p>7.1 It is possible that residents at the west of the runway will receive less respite as flights on the northern runway are concentrated on a single flight path.</p> <p>7.2 The extended north runway option will expose fewer residents in Slough to significant aircraft noise, but conversely may increase the exposure/intensity of noise for those Slough residents who currently experience high levels of aircraft noise and who reside close to the airport and under the existing and new flight paths. Overall this option exposes more population to noise and also reduces the potential respite that 3 runways will offer through managed rotation.</p>	<p>7.3 Respite can be offered as all runways can be operated independently.</p> <p>7.4 The North-west option will expose parts of the Borough to aircraft noise for the first time particularly with respect to takeoff operations in westerly direction.</p> <p>7.5 There will be a need for significant noise mitigation packages for residential and other noise sensitive properties in Slough; but ultimately there will a permanent material impact due to aircraft noise which Slough residents will have live with.</p> <p>7.6 There is a need to acknowledge this change in soundscape and to suitably compensate the impact on residents, business and amenity areas with Slough.</p>
8 Air quality	<p>8.1 Four Air Quality Management Areas have been declared in Slough, including all sections of the M4 within the borough, the A4 in the central section of the town, the A355 north and south of the A4 and the A4 east of M4 J5. Air quality is known to exacerbate already poor health outcomes in Slough, with any increase in surface access to the airport potentially causing a further deterioration in air quality across the borough. The town is</p>	

	<p>also highly susceptible to congestion generated by disruption across the strategic network as the A4 which runs through the centre of the town is used as an alternative route. Air quality is a significant public health issue that needs careful consideration and mitigation.</p> <p>8.2 The air quality mitigation package accompanying the north-west runway proposal is well developed in respect of controlling emissions particularly airside, however there is a need to go further to promote, financially support and construct more sustainable transport links along the A4 corridor, railway network and M4 corridor. The mitigation measure proposed should be regarded a starting point and specified as minimum requirements.</p>
9 Flooding	<p>9.1 Both proposals impact on watercourses and have the potential to increase flood risk. Colnbrook and Poyle experienced flooding in 2013 and early 2014, therefore the borough council would encourage scheme promoters to utilise local knowledge when setting out flood alleviation proposals. The borough has secured £3 million of funding from Department for Environment Food and Rural Affairs for flood alleviation projects in the area, and could encourage subsequent flood measures to complement these schemes.</p>
10 Employment¹	<p>10.1 Maintenance of the status quo at Heathrow would result in a reduction in employment at the airport over time due to less labour intensive operations. It is estimated that this could lead to a reduction of 2,251 Slough residents working in catalytic and non-catalytic (direct, indirect and induced) jobs associated with Heathrow by 2030². This position could worsen in the long term if Heathrow's position became severely compromised. This impact would be reduced if Gatwick expanded as it is predicted that by 2030 there could be a short term enhancement of overall hub capacity. Under a do-minimum scenario catalytic and non-catalytic jobs in the western wedge region reduce from the current 123,100 to 108,000 by 2030 without expansion³. A reduction in the number of destinations accessible via Heathrow may adversely impact the desirability of the location around Heathrow for businesses and could consequently lead to a reduction in catalytic employment.</p> <p>10.2 Local businesses fear that Heathrow will not be able to maintain current service levels, and there is a perception that quality has declined in recent years. A number of companies foresee an erosion.</p> <p>10.3 Expansion at Heathrow is estimated to result in an increase of 5,435 jobs by 2030 across all airport associated forms of employment.</p>
11 Economy	<p>11.1 The high percentage of foreign owned companies located in Slough (36% of total borough employment is in foreign owned companies) is an indication of the importance of international connectivity to these companies, which generally have larger workforces than nationally owned companies. The close proximity of Heathrow is a key determinant of the location of these business, especially adjacent to the M4 corridor with excellent access to Heathrow. There are also a number of companies located in Slough which rely on rapid connectivity for the receipt and delivery of high value freight. Both options appear to provide the capacity required to connect with new markets and provide reliable and frequent connectivity demanded by local businesses.</p> <p>11.2 While companies do not have detailed plans extending a far into the planning horizon as the late 2020s, there could be an immediate impact on property negotiations and a move towards agreeing longer leases.</p>

¹ Heathrow Employment Impact Study, Parsons Brinckerhoff and Berkeley Hanover Consulting, December 2013 (all employment figures from here unless otherwise stated)

² Ibid

³ London Heathrow Economic Impact Study, Regeneris Consulting, September 2013

12 Surface Access	<p>12.1 Both Heathrow expansion proposals rely on a substantial increase in public transport use and constraints on vehicular access to the airport in order that the M4, M25 and local roads do not get overloaded. Significant measures would be needed if this 'no growth' in airport-related road traffic objective is not met.</p> <p>12.2 The ability of the local road network in the Heathrow area to meet the future needs of both airport-related and other traffic has not been demonstrated. Detailed modelling needs to be undertaken to give assurance on this point. The HAL proposal in particular relies on significant changes to the existing network.</p> <p>12.3 In addition to the financial pressures which could fall upon the authority as a result of reducing council tax and business rates, the authority would be concerned if it had to fund surface access improvements as suggested in 3.95/3.146</p>
13 Planning remit	<p>13.1 The plans do not currently make clear the full extent of works that will be needed to implement the development for either option. The "red line" is only drawn around the operational area for the airport. It does not include all of the other land that will require planning permission in order to deliver the off site infrastructure, roads and displacement.</p> <p>13.2 It is important that the Master Planning work includes these areas and all of the land that will be directly affected by the proposals to allow local authorities to be involved in the design and planning process.</p>

2 Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

2.1 The expansion of Heathrow does not only increase the magnitude of operations but brings Heathrow within Slough and substantially closer to the local population. As a result of this cumulative effect, substantial mitigation will be required to limit the impacts on the local population.

	Extended Northern	North West
1 Noise	<p>1.1 The proposals for noise insulation and property compensation are less well developed for the Heathrow Hub proposal than for the HAL proposal. Fewer new people in Slough would be affected by the extended northern runway in terms of noise, however the intensity of noise would likely increase, and respite will be diminished.</p> <p>1.2 The noise insulation and compensation package proposed by HAL is welcomed, however the council would like reassurances that the funds set aside are sufficient to meet the needs of the newly exposed population in Slough, which will be substantial in number.</p> <p>1.3 If either option is chosen, the council would favour the establishment of an independent noise body/authority, comprising noise and medical experts and representatives from the surrounding local authorities, whose remit would include overseeing the noise insulation scheme, including post-implementation testing and the establishment of an approved contractors list. We would expect the body to carry out research on noise impacts specifically sleep disturbance. The council wish to have representation on the body and work with it to agree noise thresholds and internal noise standards.</p> <p>1.4 Night flights should not be permitted between the hours of 23.00 and</p>	

	<p>06.00. Noise Preferential Routes should be routed away from populations, the quietest operating procedures must be mandatory and infringements of noise limits subject to fines that should be redistributed into noise insulation measures and community based projects. Noise Preferential Routes should also aim to avoid public open space due to the inherent difficulty of reducing noise, and the importance of these open spaces due to the dense urban nature of Slough.</p> <p>1.5 If the HAL north west runway were to be chosen, insulation of public buildings, especially schools, would become a more widespread requirement in Slough. The cost of this work as well as ongoing costs should be met by Heathrow.</p> <p>1.6 Clarity is required on when the cost and implementation of noise insulation of eligible properties and areas transfers from the responsibility of the airport to the responsibility of the planning system. It should be recognised that planning consent for a building may have been granted but not implemented prior to approval of a scheme.</p> <p>1.7 Fixed noise monitoring stations will also need to be expanded to cover affected areas of Slough and the cost of operation needs to be covered by the airport operator.</p> <p>1.8 A comprehensive sustainable noise plan needs to be developed for either option with an independent validation by the external auditors to determine the effectiveness of implementation and effectiveness and to continue to reduce the 55 L_{den} noise footprint with the adoption of quieter aircraft and operating practices.</p> <p>1.9 Consideration should be given to required noise insulation at Pippins and Colnbrook C of E School, and Vicarage Way Children's Centre.</p>	
2 Respite	2.1 Absolute respite will be more difficult to provide because aircraft from both elements of the extended runway will travel along the same line. Effective respite must be provided to Colnbrook.	2.2 Three independent runways have the potential to offer respite although new communities will be affected.
3 Air Quality	<p>3.1 Significant surface access measures (detailed later) are required to reduce the number of fossil fuel dependent vehicles accessing Heathrow to improve air quality. There is a need for modal shift to public transport and a shift change to low emission vehicle infrastructure both airside and off site. Accessibility between Slough and Heathrow by sustainable transport must be improved given the close proximity.</p> <p>3.2 Significant measures are required to improve very poor air quality around M4 junction 5/Brands Hill, which can be attributed to airport traffic including freight both directly and indirectly related to airport operations. The nature and composition of vehicle/car/lorry traffic should be studied by the Heathrow promoters to inform which measures could alleviate congestion and poor air quality here including adoption of low emission zones. Fixed air quality monitoring stations are required to monitor and validate the impact of road traffic on air quality and to provide real time information to residents. We would expect Heathrow to contribute towards the cost of this monitoring and validation. We would also expect investment in SMART technology (lamppost indicative monitors to continuously monitor air quality and to alert drivers and public during poor air quality episodes). Public transport should continue to be subsidised.</p>	

	<p>3.3 Congestion charging should be implemented if the minimum 50% modal shift to public transport is not met at year of operation. The modal shift should go further with higher target levels up to 65% public transport being met by 2040 so there is continuous sustainable reduction in total emissions achieved for all direct and indirect airport operations. All public transport shall be Ultra Low Emission Vehicle compliant by 2025.</p> <p>3.4 Slough Borough Council has received funding from Government to establish a low emission strategy for the borough. This strategy will be prepared in consultation with Heathrow to ensure there is an integrated approach to reducing air pollution. A low emission zone will be explored to cover A4 strategic western access to Heathrow, and adoption of low emission technologies, including EV charging infrastructure, electric taxi and bus infrastructure and low emission freight infrastructure which would require the co-operation of and investment from the Heathrow promoters.</p>
4 Surface access	<p>4.1 Slough's transport network is heavily impacted by Heathrow. Slough currently benefits from good connectivity to Heathrow, but the town's transport network is susceptible to heavy congestion if the M4 or M25 are congested. Both Heathrow proposals involve changes to the existing local road network which could affect connectivity and technical work needs to be carried out to demonstrate that these will be able to cater for the future demands from airport-related traffic (passengers, staff, cargo and servicing) as well from other local road users including those who will be required to divert around the new airport boundary.</p> <p>4.2 Limited attention is given in the Heathrow promoters' proposals nor in the Commission's assessment to bus services that connect the airport from communities to the west including Slough. Being outside London most of these services are operated on a commercial basis and their routes, frequencies and fares are set by the bus operators. At certain times of the day and week these services receive financial support from HAL and Slough and Windsor & Maidenhead councils. Investigations need to be carried out into the future role and funding of these services.</p> <p>4.3 Slough Borough Council is currently developing Slough Mass Rapid Transit⁴ to connect Slough Trading Estate and the town centre with the M4 junction 5. Phase one of the project has been allocated funding from Thames Valley Berkshire Local Enterprise Partnership's Local Growth Deal. This could be extended as part of phase two to connect to Heathrow, and the council sees this as an essential element of the Heathrow promoters' surface access packages.</p> <p>4.4 Western Rail Access to Heathrow is a strategically important project which will improve public transport mode share for many locations west of the airport. The council strongly supports this project and welcomes the Commission's emphasis on the project, regardless of whether Heathrow expands or not.</p> <p>4.5 In their May 2014 submission to the Commission HAL propose an alignment for a new road (a replacement for the Colnbrook by-pass providing access to the south) that would divert traffic south to the High Street/Old Bath Road and cause significant disturbance to that community. Slough Borough Council objects to this completely unsuitable alignment and considers it an under provision. An alternative route should be identified that skirts Colnbrook. The council is aware of subsequent proposals for a</p>

⁴ <http://www.slough.gov.uk/parking-travel-and-roads/slough-mass-rapid-transit-smart.aspx>

	<p>southern branch of the Colnbrook bypass/replacement of the A3044. This will be required to cater for airport-related traffic heading to Heathrow West and the cargo area as well as local traffic displaced by the closure of the A3044. We have identified however that this has the potential to encourage rat running between M25 junction 14 and the M4 junction 5, and may lead to further impact on air quality and congestion in this area. Considering the above issues, and the business rate concerns expressed in Q1 section 3 the council would favour a new tunnelled road, parallel to the tunnelled M25 which reconnects with the new A4 diversion west of the M25. This would provide a more suitable and direct replacement of the A3044 and prevent additional traffic detouring around the western end of the new runway which would place an unnecessary burden on the residents of Colnbrook. A similar measure has been suggested for the Heathrow Hub extended northern runway.</p> <p>4.6 The Council notes the estimates put forward by the Commission's consultants for the capital cost of the A4 and A3044 diversions. The length of the A3044 diversion is taken as 1km which appears to be for the link road proposed in the May 2014 submission. As stated above this alignment is not acceptable to the Council and the cost of an alternative route would need to be investigated.</p> <p>4.7 For those living closest to the airport in the east of Slough, surface access should be made more convenient and accessible. Despite the relatively small distances, journeys can be inconvenient, unreliable or circuitous. Those living closest should have greater choices of access to the airport by more regular bus services which travel on more convenient routes (i.e. not just the Colnbrook by-pass), bearing in mind that both expansion proposals involve the severance of the local link currently available via Bath Road. Residents should also benefit from improved cycle access. The council would welcome the opportunity to work with Heathrow on a strategy for cycling, and to ensure that Heathrow's cycle network connects with Slough's.</p> <p>4.8 To encourage those accessing Heathrow from the west to use public transport, the existing free travel zone should be expanded to Slough for residents and Heathrow employees, and should be expanded to include the Transport for London 81 service.</p>	
5 Freight and HGV vehicles	<p>5.1 Both proposals for expansion at Heathrow would result in an increase in cargo but neither have details of how this would impact on Slough, both in terms of established freight businesses in the Borough and of related traffic movements (HGV and other commercial vehicles). More attention needs to be given to these aspects.</p> <p>5.2 Colnbrook already suffers from the impacts of HGV lorries waiting to access the airport. Anti-social behaviour is commonplace as lorry drivers stay overnight in lay-bys where there are no facilities. This problem must be addressed, regardless of expansion, but the pressure under expansion would be such that lorry parking and waiting facilities must be provided on-airport to eliminate the blight currently experienced by these residents.</p>	
6 Parking	<p>6.1 The closer proximity of Heathrow to Colnbrook could result in adverse impacts on parking in residential and other roads in Colnbrook by those accessing the airport as passengers or staff. Scheme promoters must address this issue, and fund the required remedial measures.</p>	
7 Community	<p>7.1 More detail is required on measures to support</p>	<p>7.3 The council would also like to see more clarity on measures for social</p>

	<p>households whose homes are compulsorily purchased to implement the scheme, as well as measures to support social tenants and providers of social housing to ensure that displaced populations are not disadvantaged by the requirement to move, and that noise insulation is available to tenants as well as residents.</p> <p>7.2 The realignment of the M25 to the west would result in the motorway being in very close proximity to residential properties in Colnbrook.</p>	<p>tenants who will not be eligible to the same support to relocate as homeowners in the area, as well as details on the provision of noise insulation to social tenants/landlords.</p> <p>7.4 We would like reassurances that HAL's offer to buy is generous enough to allow residents who chose to move to secure a local like for like property. This offer must also be managed carefully. It is important that there is a mixed and balanced community continues to exist, and close working with Slough Borough Council would support this. It should not only be those with no choice as to where they can live who are placed in these properties. We feel that for those who chose to stay within the offer to buy area and maintain the fabric of the existing community compensation payment should be offered, equivalent Gatwick's offer to pay council tax for those residents who have chosen to stay. We would advocate this for existing, and not necessarily new residents.</p> <p>7.5 Expansion at Heathrow will have a major impact on the Colne Valley Park which is of local and regional significance. We do however welcome the proposed improvements to the Colne Valley Park, and wish to see tree planting along new roads and structures to mitigate urbanisation and provide sound, pollution and visual barriers.</p>
8 Council finance	<p>8.1 The loss of housing and commercial land in Colnbrook/Poyle would result in a loss of council tax and business rates income for the council totalling more than £10 million per annum, at the same time as additional pressures are placed on the borough. The council expects to be compensated for this loss, or for an alternative settlement which does not disadvantage the council as a result of matters which are out of its control.</p>	<p>8.2 The loss from the borough of the Lakeside Estate containing the Colnbrook Energy from Waste plant, the associated Materials Recovery Facility (MRF) and other businesses would result in significant loss of business rate income (£4.5m pa), which the council would expect to be compensated for if the plant is relocated out of borough. A location out of borough would also result in additional pressures associated with waste disposal which the council would expect to be compensated for. The council has ambitions to become a zero waste to landfill authority and the EfW plant is central to achieving this. There are</p>

		<p>opportunities to reprovide a more modern plant making the best use of new technology (including anaerobic digestion). New chimney technology could also be employed reducing chimney height and relaxing the requirement on location of the plant.</p> <p>8.3 If the latest iteration of the Colnbrook bypass is provided and requires the removal of Galleymead Road industrial uses a further £1.25m of business rates per annum would be put at risk.</p>
9 On airport facilities	<p>9.1 Facilities provided as part of both schemes should be sufficient to meet the needs of airport users but should not seek to compete with surrounding areas. This applies especially to office, retail and hotel space which if provided as an attractor would compete with Slough town centre and business areas.</p> <p>9.2 Slough should have the ability to influence the facilities included through the planning process, and weight should be given to our views through the planning system, following changes to current arrangements if required. The effects of the airport on the local area are too significant to be determined in isolation, and without the views of officers having the opportunity to play a formal role.</p> <p>9.3 More information is needed on the servicing of these facilities and the potential impact on the local road network.</p>	
10 Construction	<p>10.1 A project of this size in such close proximity to Slough has the potential to exert significant impact on the town for a sustained period of time. It is essential that the Colnbrook freight rail line is retained and utilised to reduce HGV access to the site and that a detailed road traffic management strategy is put in place. Scheme promoters must make provision to house construction workers not residing in the local area to avoid problems experienced during the construction of terminal 5 where construction workers inhabited temporary buildings. Scheme promoters must employ sustainable procurement processes enabling local SMEs to benefit from the opportunity and alleviate the impact of a large external workforce. Plans should be in place well in advance to help local residents access the skills required through apprenticeships to secure employment both during construction and operation of the airport, with a target of 10% of the construction workforce being drawn from Slough. As a borough in close proximity which has a number of impacts as a result of Heathrow, Slough should receive a fair proportion of employment and training opportunities offered at Heathrow.</p>	
11 Economy	<p>11.1 Slough based small and medium size businesses need to be supported through Heathrow Airport limited and its major occupying businesses through their supply chains. The growing number of 4,000 plus SMEs in Slough have capabilities, products and services that are of benefit to Heathrow and its businesses. Procurement opportunities, tenders and general information on business to business services need to prioritise Slough based SMEs as business partners so that they have every opportunity of winning tenders. This supports the growth of the town's economy, strengthens the business community and sustains local employment.</p> <p>11.2 We would like to see the percentage of our total workforce employed at</p>	

	Heathrow increase by 2% to 8.8%. Increasing the share of employees drawn from the closest boroughs will reduce the requirement to provide new housing for a new workforce, and also reduces the number of employees required to travel long distances to work.
12 Housing	<p>12.1 The council does not agree with the Commission's assessment of the need for additional housing. Housing targets for Slough make provision for additional housing required by economic growth driven by Heathrow and the strong local economy. The number of unemployed and underemployed in the local area will also provide a proportion of the required workforce, reducing the effect to which those completely new to the area would be required. Increasing the number of employees from the local area will reduce the requirement to deliver new housing for the required workforce.</p> <p>12.2 Given the stress which it is accepted comes with buying a new house and moving home, the council would advocate the creation of a resettlement team for displaced residents, especially for those who require additional assistance. If these steps are not taken these households may approach the council for advice and support under homelessness legislation which would place additional pressure on already stretched resources.</p> <p>12.3 Under both schemes Slough would welcome the opportunity to deliver a new 'decant' community on the periphery of our existing boundary, where residents who live in Colnbrook and need to move either as a result of HAL's offer to buy scheme or who are forced to move as a result of the extended northern runway could be given preference. Slough's ability to deliver this scale of provision within its own boundary is severely limited by existing boundaries but would welcome the Commission's promotion of such provision.</p>
13 Planning remit	<p>13.1 There should be a greater recognition that to deliver the infrastructure required for the airport and the re-provision of displaced land uses a larger planning 'red line' should be recognised.</p> <p>13.2 Slough would strongly resist losing planning responsibility for elements of the airport expanding west of the M25 given the impact on the borough and the amount of land given up. The development will also cross the Greater London boundary and amending of these boundaries would be strongly resisted by Slough.</p>

Questions on the Commission's appraisal and overall approach

- 3 Q3: Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.
- 4 Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?
 - 4.1 There are a number of issues which Slough Borough Council does not believe have been considered by the Airports Commission.
 - 4.2 We would wish to see a recognition of the funding implications for Slough Borough Council (and other local authorities if relevant) of the loss of income as a result of residential and business demolitions. A larger portion of local authority funding now comes from council tax and business rate receipts, as government grant funding has reduced. This is especially pronounced for Slough. Slough is a densely populated urban borough with little remaining land suitable for development, therefore relocating displaced land uses elsewhere in the borough will be almost impossible. In this scenario additional costs will be incurred by the authority in terms of increasing demand as a result of Heathrow expansion while at the same time income will be reduced. Our preliminary calculations estimate that the extended northern runway would result in the loss of a number of business parks in Poyle including the Trident, Britannia, Coln and Viscount Industrial

Estates and McKay Trading Estate putting at risk almost £9 million of business rates. The diversion of the M25 could potentially result in the loss of Galleymead Road and the industrial uses here represent more than £1.25 million in business rates, bringing the total value at risk for the extended northern runway at around £10m per annum. In addition to this 229 homes within the local authority area will be lost, removing around £300k of council tax income. For the north west runway the loss of the Lakeside Estate, including the Energy from Waste plant and other commercial uses would put at risk more than £4.5 million of business rates, and more recently proposals to divert the Colnbrook by-pass south of the runway extension may require the relocation of Galleymead Road commercial premises, putting at risk a total of around £6m for the north west runway proposal.

- 4.3 There appears to be little detail from scheme promoters, and little analysis by the Commission on the possible location of replacement housing for displaced households nor to accommodate additional housing required. Provisions for additional housing and community facilities may need to be made alongside the planning process for the airport itself as this may necessitate a change in approach.
- 4.4 If either of the Heathrow expansion options is delivered, Slough Borough Council would resist strongly any loss of land required for the airport to another authority. The boundary of the airport is currently contiguous with that of London Borough of Hillingdon, however the unprecedented scale of land required for either of the short listed options requires careful consideration. Both would result in loss of income, housing and business premises which would be almost impossible to re-provide in Slough given its current boundaries and the extent to which development extends to the local authority boundaries.
- 4.5 We would therefore encourage the Commission to recommend that an independent review panel is set up with Government to investigate the impacts on surrounding local authorities should a Heathrow option be chosen. Issues requiring consideration include the establishment of a boundary review to take into account reactionary and required changes, or Greenbelt changes to facilitate the delivery of necessary supporting infrastructure or facilities.
- 4.6 The Commission is due to carry out further work to quantify the local air quality impacts and the extent to which mitigation will reduce air quality impacts, for example by modelling dispersal of emissions. As this work remains incomplete as the consultation period ends we would welcome the opportunity to comment on this work. We are of the view that the minimum standards to be achieved for either of the shortlisted Heathrow airport proposals should be at neutral impact meaning no change in air quality as measured in total emissions against current operations. This should be achieved through the progressive adoption of cleaner aircraft and implementation of Ultra Low Emission Vehicle fleet airside, as well as investment into ULEV public transport and freight off-site. We urge compliance at all sensitive receptors with the current EU limits for NO₂ AND PM₁₀. We are also of the view the commission should consider a recommendation for a continuous annual emission reduction plan of particulate emissions, as there are no safe levels for human health.

Questions inviting comments on specific areas of the Commission's appraisal

- 5 Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?
- 5.1 The council notes that the assessment of roads in the vicinity of the airport contained in the Commission's Module 4 documents has been constrained by lack of information about airport-related local trip generation and distribution. Both proposals include significant changes to the local road network and assurance is sought that more detailed work will be undertaken to assess the potential impact of expansion in terms of local road traffic, both airport related and non-airport related and hence the impact on air quality as a result of airport related traffic.
- 6 Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?
- 7 Q7: Do you have any comments on the Commission's business cases, including methodology and results?
- 7.1 Slough Borough Council strongly supports the delivery of Western Rail Access to Heathrow to deliver improved journeys to Heathrow from the west, and has been arguing for this project for a number of years. The council is pleased to see Western Rail Access to Heathrow included in the extended baseline for both

Heathrow short listed schemes. The council agrees with the Commission's view that Western Rail Access should be delivered regardless of whether Heathrow expands or not, with planning for this project advancing well. The link is expected to generate economic growth of £800 million and efficiency savings of £1.5 billion, as well as deliver 5,100 tonnes of carbon savings and a modal shift to public transport of 10% based on a two runway airport under current operations⁵. WRAtH is necessary to mitigate against congestion, poor journey time reliability and poor journey experience from the west, and to alleviate the impact of the airport on local residents. If Heathrow expands, WRAtH will play a vital part in ensuring convenient, efficient and timely access to the airport, whilst minimising the impact of the local population.

- 7.2 While WRAtH meets the Department for Transport specification which required direct services to Slough and Reading and longer term opportunities for through running long distance services, it does not appear from the information available that the Heathrow Hub station would meet those requirements. While WRAtH makes good use of existing infrastructure by providing a link between the existing Great Western Main Line and Heathrow Terminal 5 station, the Iver hub proposal would require an additional station which would increase journey times for existing passengers. Studies also demonstrate that passengers travelling to an airport are especially sensitive to interchanges, while the Iver hub proposal increases the number of interchanges. It also appears that the hub station is more expensive to deliver than WRAtH.

Other comments

8 Q8: Do you have any other comments?

- 8.1 Slough Borough Council supports expansion at Heathrow Airport because of the economic benefits to the town, the region and the UK as a whole. Extra capacity is required in the south east, and we believe that to deliver the greatest economic benefit from this, an additional runway should be delivered at Heathrow.
- 8.2 Given our assessment of the two shortlisted proposals the council prefers Heathrow Airport Limited's North West runway over Heathrow Hub's Extended Northern runway.
- 8.3 The North West runway will not require the loss of residential properties in Slough on the scale that the extended Northern runway would, and it will cause less disruption to the established and valuable businesses located on the Poyle Industrial Estate. Subject to detailed engagement on the local road network, as detailed in the submission, the council believes that the North West runway will cause far less physical disruption to the borough of Slough, than the extended Northern runway proposal. This is also subject to satisfactory relocation of the displaced businesses on Lakeside Estate, especially the Energy from Waste plant and associated MRF plant to alternative locations in the borough.
- 8.4 Local representations have made clear that the impact of the extended Northern runway would not allow them to support it, and have urged the council to rule out this option.
- 8.5 It is our view that the North West runway facilitates more respite for communities than the extended Northern runway, which is highly valued by people affected by aircraft noise.
- 8.6 The council has greater confidence in the deliverability of Heathrow Airport Limited's proposal, given the greater level of detail included in the plans to date, and the fact that HAL has developed the proposals for the North West runway. It would need to develop the proposals for the extended Northern runway which could potentially delay delivery of additional runway capacity.

⁵ Western Rail Access to Heathrow Economic Value Study, Atkins, April 2010