

Please reply to: [REDACTED]
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Date: 2nd February 2015



Sir Howard Davies
Airports Commission Consultation
Freepost RTKX-USUC-CXAS
Airports Commission Consultation
PO Box 1492
Woking
GU22 2QR

Dear Sir Howard

Re: Airports Commission Consultation: Increasing the UK's long-term aviation capacity

On behalf of the Royal Borough of Windsor & Maidenhead (RBWM), I would like to take the opportunity to formally submit the representations of the Borough to the Airports Commission.

This submission is made with regard to the current consultation concerning the UK's long-term aviation capacity and the three options currently before the commission; two at Heathrow and one at Gatwick.

It must be noted that this submission follows correspondence sent on 12th December 2014, requesting that the Commission allow a further period of time to consider both the volume of information before interested parties & the missing elements including: flood mitigation, housing master plan, surface access mitigation plans and a robust noise mitigation master plan.

Please find the below response template, set out by the commission, detailing our considerations & the key implications for the residents of the Royal Borough. Throughout our response we wish to reaffirm our belief that Heathrow can be better and not bigger. Taking this into account, it can be said that the proposal at Gatwick remains the only viable long-term aviation option in front of the Commission at this time.

Yours sincerely

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

About you

Are you responding to the Commission's consultation as an individual or as part of an organisation?

☒ Individual

☐ Organisation

About you (continued)

Please only answer this page if you are responding as an organisation.

Please provide the name of your organisation.

Royal Borough of Windsor & Maidenhead

Please indicate the category of your organisation (select the most applicable)

☒ Local government

Is your organisation based in the UK?

☒ Yes

☐ No

About your organisation

Please only answer this page if you are responding as an organisation.

Please provide the first part of your postcode, e.g. D12, SW17.

██████

Please supply your email address.

Your email address is important to help us ensure that all responses to the consultation are unique, and to inform you about the outcomes of the consultation if you would like us to do so. It will not be used for any other purpose.

Would you like to be informed via email of the outcomes of the consultation?

☒ **Yes**

☐ **No**

Your views and conclusions on the three short-listed options

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 3 of the consultation document.

If you have any comments, please provide them below. If you have no comments, please go to the next question.

RBWM Conclusions

1. The Royal Borough has long adopted the position that Heathrow Airport should be “better not bigger”. This position reflects the fact that the airport and the communities that surround it can coexist as neighbours, whilst stressing in the strongest possible terms that the existing impact upon residents is already unacceptable, without seeing the airport expand further. The mandate is supported by Borough residents across all wards, as determined in recent poll results (see Q8). Further information regarding the Borough’s detailed considerations will be provided within the responses to later questions.
2. When viewing the three options before the commission, balancing the total impact across all of the appraisal modules, the Royal Borough advocates the conclusion that there is a net detriment to the two Heathrow proposals and invites the commission to recommend the second runway at London Gatwick, particularly on economic grounds.
3. This support is highlighted within the results of the recent representative poll of Borough residents; revealing a net 35% of residents actively support the proposals at Gatwick, compared to a net 8% opposition for both the proposals at Heathrow Airport.
4. The Borough has many villages and towns within the current 57dB noise contour, used to assess noise impact from take-off and landings at the airport. These include: Windsor, Eton, Datchet, Wraysbury and Old Windsor. In addition, communities such as Ascot, Sunningdale and Sunninghill have been frequently disturbed by aircraft noise during the recent future airspace trials.
5. Both Heathrow schemes proposed would see capacity rise at the airport with the number of air traffic movements (ATMs) increasing (subject to planning permission) from 480,000 to around 740,000. This represents a 54% increase, with fleet stock likely to increase in size.
6. The Heathrow Hub (Hub) Proposal would see the construction of a 6,800m northern runway extension to the west of the airport into the borough – destroying the villages of Poyle and Colnbrook in the process. For the remaining conurbations, the Hub proposal would see the noise impact more than double the predicted 2030 baseline (as much as +6dB in areas such as Windsor & Eton; with aircraft being around 400ft lower than

currently experienced). This impact would be catastrophic for these communities and as such the Borough opposes this option in the strongest possible terms.

7. The Heathrow Airport Limited (HAL) proposal would see the construction of a new third runway to the north west of the airport; the terminus of which would lie within the village of Poyle, thus having a devastating impact on this village and the adjacent villages of Colnbrook & Horton. As with the Hub proposal, noise impact is likely to see a 2-3dB increase for the remaining conurbations, in addition to the proposal introducing new communities to direct overflights to the north of Windsor. Reiterating the conclusion made with regard to the hub proposal, the noise impact attributed to this proposal is unacceptable.
8. Before effective conclusions can be made by the commission and by respondents, a comprehensive set of mitigation options must be established by the promoters. It is essential that these options address: noise insulation to achieve noise standards determined by the World Health Organisation (WHO), addressing areas affected by night & early morning flights and adequate compensation for loss of predictable respite and amenity (including loss of amenity / ability to enjoy outside spaces). The Borough wishes to highlight that these factors already apply to the current noise climate experienced by residents; with the airport needing to go a lot further than the current day & night noise insulation schemes. The Borough advocates that the airport improve and expand the quieter homes initiative, so that the above factors can be taken into account and applied to those communities to the west of the airport.
9. Mitigation measures should also go further than noise; including the establishment of measures to help ensure the National Air Quality Objectives are met and maintained, adequate surface access provision & improvements so that local residents, businesses and tourist users are not adversely impacted on the surrounding roads and public transport infrastructure.
10. It is important for the commission to acknowledge that for those communities lying under runway approaches, predictable respite is an absolute requirement. Due to airspace constraints, the southern runway (for both schemes) and proposed 3rd runway (for HAL scheme) will have to operate in mixed mode. Operating in this fashion will see respite drastically reduced for these communities ; with areas such as Old Windsor and Wraysbury seeing their existing half-day respite reduced to just over 4 hours. It should also be noted that (for the HAL scheme), due to the proximity of the proposed north and north-west runways, the Commission should not consider operations from these truly independent for the purposes of determining respite.
11. One key impact is the demand the proposals would have upon the Royal Borough to provide additional housing, commercial, industrial land. The full impacts of land take for the Borough are unclear as all the requirements for the proposed airport expansion and anticipated associated growth are not fully documented, assessed or considered as part of the supporting consultation documentation. This limits the ability of the Borough to provide objective comments to these specific proposals at this time.

12. An upper-end housing estimate of 70,800 homes highlights the scale of this pressure and the demands that would be placed on areas such as the Royal Borough to accommodate this demand. The Council notes that all of these anticipated projections would be 'on top' of the figure for the Royal Borough of Windsor and Maidenhead to meet our objectively assessed needs for housing (relevant to household projections). It should be noted that the Royal Borough of Windsor and Maidenhead has historically delivered 350 additional homes per year and has estimated an ongoing supply of a similar proportion. Increasing provision above this would require the release of land from the Green Belt.
13. The Borough wishes to stress the significant impact both proposals would have upon the number of sites needing to be identified by the Council in its emerging Borough Local Plan, particularly in relation to the shortfall which cannot be provided by those authorities more proximate to the Heathrow site. Such impacts are only likely to exacerbate the current deficiencies of land take and those displaced by such demands.
14. It is important to acknowledge that the scheme promoters have not provided in sufficient detail the range of surface access demand management mechanisms by which users are said to be incentivised to car pool or switch transportation modes for example.
15. This factor is particularly prevalent, with the Borough having declared an Air Quality Management Area (AQMA) for Nitrogen Dioxide (NO₂) (required for areas breaching EU air quality objectives) at J13 of the M25 / Wraysbury Road interchange. Should the aspired modal shift in transportation not be evidence / observed, local highways (such as the A308) which are already at capacity at peak periods will become overwhelmed, thus exacerbating the air quality issues and resultant health effects for residents in the area. This is likely to be made particularly worse, should the airport be allowed to double its share of cargo movements & the resultant HGV traffic it would create. It is also worth noting historical aspirations regarding modal shift away from cars have yet to be realised, particularly on this stretch of road.
16. Potential interaction between watercourses, groundwater and surface water runoff has not been assessed for the two proposals at Heathrow. Significant uncertainties therefore exist regarding the mitigation of fluvial and surface water flood risk, and potential flood risk impacts on downstream (and upstream) communities. This is a great concern to the Borough.
17. Both proposals at Heathrow are also located in an area that could be at a significant risk of surface water flooding and it is unlikely that surface water could be drained by gravity systems. Failure to properly attenuate surface water runoff could lead to a significant increase in flood risk to downstream communities which is also a great concern to the Borough. The proposal to tunnel part of the road network would only displace subsoil water storage capacity to other locations & is not deemed an acceptable proposal.

18. Further to the comments made by John Holland-Kaye CEO of Heathrow Airport Limited (HAL) to the All Party Parliamentary Group (APPG) in 2014, the Borough is concerned that any expansion of Heathrow may go further than a 3rd runway; with HAL indicating a fourth runway proposal has not been ruled out to cater for potential extra capacity (subject to anticipated permission being granted to extend the current 480,000 ATM cap).
19. When assessing the commissions considerations on the strategic fit & business case of all three options, there appears to be a lack of clarity in the long-term aviation market forecasts; such that, with fleet improvements, whether the long-haul point-to-point (P2P) market will continue to expand supporting Gatwick's proposal, or whether an expanded hub arrangement at Heathrow is truly required. The Borough would like to see the commission clarify these concepts within its decision making and reflect that more can be done within existing operations. This may include the airport making better use of existing capacity, by ensuring that aircraft are more than 70% full; thus allowing slots to become available for key routes in demand. Such a proposal would require Heathrow to seriously address the long-standing issue of 'grandfather rights' on slot availability
20. With regard to impact analysis, the Borough categorically does not concur with the Commission's viewpoint that the main impacts for areas within the Royal Borough are from noise alone (2.73 – HAL considerations). This will be expanded throughout this consultation response document. Furthermore, the assertion that such impacts can be balanced with increased 'local employment' to form a broadly neutral impact is both unsubstantiated and wildly inaccurate. It is possible that such a view may reflect the strong business focus within the Commission itself, without a balance in membership from a community background.
21. The Borough is the location of Her Majesty's main residence; Windsor Castle, its surrounding Royal Park and Eton College. As the commission will be aware the castle is strategically important for both the hosting of State events and standing as a key national tourist attraction; brining nearly 7 million tourists per year to the Borough. To subject these visitors to over a doubling of noise is unacceptable and could have a significant effect on both the numbers of visitors and the length of time spent within the town; creating a significant economic impact.
22. When viewing the three options before the commission, balancing the total impact across all of the appraisal modules, the Royal Borough advocates the conclusion that there is a net detriment to the two Heathrow proposals and invites the commission to recommend the second runway at London Gatwick.

Which of the shortlisted runway options, if any, do your comment(s) relate to? *(Tick all that apply.)*

☒ **Gatwick Second Runway**

☒ **Heathrow North West Runway**

☒ **Heathrow Extended Northern Runway**

Your views and conclusions on the three short-listed options

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 3 of the consultation document.

If you have any comments, please provide them below. If you have no comments, please go to the next question.

RBWM Conclusions

1. From the documentation submitted to the commission, it is clear that both Heathrow options would have a significant detrimental impact upon: Royal Borough residents, local businesses, institutions and the tourist trade. It is for the reasons outlined in this response document that we do not support any further expansion at Heathrow Airport under any circumstance.
2. It is the position of the Borough that Heathrow, within its current operations, can be a better neighbour – without the need for it to be bigger.

Which of the shortlisted runway options, if any, do your comment(s) relate to? (Tick all that apply.)

☐ Gatwick Second Runway

☒ Heathrow North West Runway

☒ Heathrow Extended Northern Runway

Your views on the Commission's appraisal and overall approach

Q3 Do you have any comments on how the Commission has carried out its appraisal?

The appraisal process is summarised in Section 2 of the consultation document.

Please limit your answer to comments about the approach to the appraisal. You will have the opportunity to comment on the results in another question.

If you have comments about how the Commission has appraised specific topics, constructed its sustainability appraisal or constructed its business case, you may wish to provide this information in Q5, Q6 and Q7 respectively, rather than in this question.

If you have any comments, please provide them below. If you have no comments, please go to the next question.

RBWM Comments

1. The Royal Borough commends the way in which the Airports Commission has conducted this consultation process. The transparent nature of the process, together with the breadth of detail being considered is appreciated.
2. The Commission should however be aware of the manner in which some information has been put before it by the scheme promoters. This is predominantly due to many of the arguments (particularly noise) being expressed in terms of population density affected; thus assuming this is an adequate measure of impact. As with any investigation into noise nuisance; time, frequency, duration, nature and severity need also to be taken into account – particularly when assessing the likely impact to the more rural communities to the west of the airport.
3. Furthermore, the Borough would like to have seen the commission better supported by the proposers, with all information provided (including the missing data highlighted within 'Question 4' – below) in a format that is readily digestible (without being misleading) by all stakeholders, including members of the public.
4. The usage of more executive summaries would aid the reader to understand the main headline points and impacts from the proposals contained in the main reports to understand if further reading would be of interest or benefit.
5. The Royal Borough would also like to draw the Commission's attention to the timing of this consultation, with it occurring over the Christmas period. This factor is particularly prevalent due to the size of the documentation needing to be reviewed, coupled with the disparity in resources available to the promoters in comparison to Local Authorities and Community Groups.

6. It is the opinion of the Royal Borough that more work should have & needs to be undertaken to better appraise the current situation at both airports. Within the documents produced, there is an apparent presumption that the current impacts particularly associated with Heathrow Airport, are acceptable. The Borough & the residents it serves reject this assumption in the strongest possible terms. Only through appraising the current unacceptable impacts can the commission gain an understanding of the effects that increasing operations would have upon the communities already impacted around the airport.

Your views on the Commission's appraisal and overall approach

Q4 In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

If you have any comments, please provide them below. If you have no comments, please go to the next question.

RBWM – Relevant Factors

1. Perhaps the most prevalent piece of missing information needing to be considered by the Airports Commission is a comprehensive local impact analysis. This information is needed to properly assess:

Local Noise Impact

2. The information supplied by the proposers is provided on a large geographic scale, which is not sufficient for communities to be able to properly assess the precise impact at a local community level. The Borough would recommend this information be provided for each local community within a 55dB contour (reflecting WHO objectives) of the airport – detailing the specific changes associated with each option for: noise increase, aircraft height and frequency of overflights. This approach would also enhance the Government's 'localism agenda'.
3. It is also worth noting that much of the noise assessment relates to the population density affected within defined noise contours. It is paramount that the commission also gives appropriate weight to the severity of impact, including: change in noise climate, characteristics of existing background levels, difference in ATMs & height of aircraft. Such an approach would enable the Commission to clarify the rural nature of those communities to the west of the airport and therefore the scale of impact both Heathrow options are likely to present.

4. Furthermore, in order for key stakeholders including members of the public) to properly assess local impact, detailed flight paths need to be made readily available. Given that whole swathes of the Thames Valley and London will be affected for the first time by flight path noise, and areas already affected risk losing respite periods. To not have firm operating flight path proposals at this stage is unacceptable. This is especially relevant, owing to expansion (which may indeed involve plans for further runways) up to 2050 likely to exceed WHO noise levels, as previously highlighted.
5. Heathrow Airport Limited in their proposal has allocated a fund circa £550m for noise compensation & insulation (much less generous when compared to other airport schemes, including Gatwick). It is still not clear however how this figure has been calculated and indeed how it plans to be used. The Borough would suggest that the commission need to firstly ensure a full & proper study into mitigation need is conducted before any figure is derived – as this may carry particular pressure on the financial deliverability of the proposals before it.
6. Addressing earlier comments on the current conditions arising from Heathrow operations being unacceptable; The Borough would recommend that any mitigation master plan be based on up to date noise contours, and not those based upon out of date noise matrices.
7. Any new noise metric developed should ensure that current attitudes to noise from an integral part to the decision making. The Borough recommends the commission instructs an independent assessment of attitudes to noise to determine the current thresholds to both: learning, health and annoyance. One attempt to achieve this was the Attitudes to Noise from Aviation Sources in England (ANASE) study which indicated that 57dB was no longer an acceptable contour to rely upon when assessing impact from aircraft operations and that number of overflights should also form a key part of the assessment methodology for determining annoyance.

Surface Access / Air Quality Impacts

8. The Commission has yet to receive appropriate information with regard to surface access pressures (in particular to local roads and key congestion areas, such as J13 of M25). Only by providing this information can local congestion & air quality (in particular PM₁₀ and NO₂) be addressed. Such information should include a full detailed assessment of the impacts on local air quality in order to ensure & have confidence the current EU limits (which are already being breached in some locations) can be achieved following the proposed development.

Housing Demand Impacts

9. The Heathrow schemes outline an anticipated pressure for new commercial, industrial and housing (lower end housing estimate of 29,800 homes and upper end housing estimate 70,800 homes) proximate to Heathrow. It is not clear however, by what mechanisms the impact of these pressures will be mitigated (ie: are Local Authorities being expected to pick up these considerations within existing local plan details?). The Borough therefore strongly recommends that the commission outlines the mechanism by which this is being appraised.

Flooding Impact

10. Any planning application proposing development in flood prone areas must be accompanied by a Sequential Test Report demonstrating that there are no suitable alternative sites at a lower risk of flooding available. The Borough wishes to highlight to the commission that this has yet to be demonstrated by the promoters of both Heathrow schemes. This must be provided to the commission & to stakeholders to allow full & proper consideration.
11. It is the Borough's opinion that only by providing stakeholders with a proper appraisal process for the manner in which local community impact is assessed, can communities and local authorities properly understand and respond to potential impact (relevant to them at a local level). At the current stage of the process, this impact analysis cannot be properly undertaken, which is a major concern as we approach the timescale in which the commission is due to make a recommendation to government.
12. RBWM formally request confirmation that all these aspects will be made available for public scrutiny before the Commission makes any final recommendation. As it stands this appraisal consultation is deeply flawed without them. The commitment to an open and transparent process, as made by the Commission from the outset of this process, is in danger of failure if key information is not open to those who stand to be impacted.
13. There appears to be a lack of early and on-going engagement with the Borough on these factors, especially considering the likely impacts of both Heathrow proposals and that the Northern Extended Runway is partly located within the Borough boundary.

Your views on specific areas of the Commission's appraisal

Q5 Do you wish to comment on how the Commission has appraised specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

<https://www.gov.uk/government/collections/additional-airport-capacity-consultation-supporting-documents>

Your views on specific areas of the Commission's appraisal

Which appraisal modules would you like to comment on? Please tick all that apply.

- | | |
|---|--|
| <input checked="" type="checkbox"/> Strategic fit | <input type="checkbox"/> Economy impacts |
| <input checked="" type="checkbox"/> Local economy impacts | <input checked="" type="checkbox"/> Surface access |
| <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Air quality |
| <input checked="" type="checkbox"/> Biodiversity | <input type="checkbox"/> Carbon |
| <input checked="" type="checkbox"/> Water and flood risk | <input checked="" type="checkbox"/> Place |
| <input checked="" type="checkbox"/> Quality of life | <input checked="" type="checkbox"/> Community |
| <input type="checkbox"/> Cost and commercial viability | <input type="checkbox"/> Operational efficiency |
| <input type="checkbox"/> Operational risk | <input type="checkbox"/> Delivery |

Please enter your comments on the selected appraisal modules below. If you need additional room please attach further comments on separate pages, clearly noting the title of the appraisal module and shortlisted runway your comments refer to.

Please see below

Which of the shortlisted runway options, if any, do your comment(s) relate to? (Tick all that apply.)

- ☒ Gatwick Second Runway
- ☒ Heathrow North West Runway
- ☒ Heathrow Extended Northern Runway

RBWM Comments – Strategic Fit

1. Within Heathrow's supporting documentation "Taking Britain Further: Vol1" it claims that all of its strategic hub competitors require between 700,000 and 750,000 ATMs, thus formulating a justification at Heathrow specifically. When assessing the commissions considerations on this matter (including the strategic fit & business case of all three options), there appears to be a lack of clarity in the long-term aviation market forecasts; such that, with fleet improvements, whether the long-haul point-to-point (P2P) market will continue expanding (thus supporting Gatwick's proposal), or whether an expanded hub arrangement at Heathrow is truly required. The Borough would like to see the commission clarify these concepts within its decision making.

RBWM Comments – Local Economy impacts

1. The Council recognises that the consultation material which supports the expansion proposals at Heathrow states that anywhere between 17,500 and 41,400 additional direct jobs could be created as a result of the expansion plans. It is clear that any expansion in employment opportunities within the area is inextricably linked to requirements for additional housing provision. It is noted in the consultation material that the NPPF is supported by the 'three pillar' principles of economic, environmental and social.
2. The Council believes that a scheme should not be promoted on the basis of the national benefits that proposals may have to only one of these principles (primarily economy), at the expense of the other two equally important principles which when viewed at a more local level are likely to have the greatest adverse impact. In this regard consideration should be given to the section in the NPPF on Presumption in Favour of Sustainable Development (in particular paragraph 14).
3. The supporting consultation material states that the expansion at Heathrow would support economic development at Heathrow Opportunity Area, Western Wedge and along an east-west axis in the Capital identified as an 'engine for growth'. Although the 'Heathrow Opportunity Area' appears to be mapped suggesting this is to the east of Heathrow rather than that to the west (which is focused upon for the expansion by this consultation). It is acknowledged that the Royal Borough of Windsor and Maidenhead is located within the authorities identified as being located within the 'Western Wedge'.
4. It is also assumed that any growth made along an east-west axis in the capital is likely to have some impacts upon the administrative area of the Royal Borough of Windsor and Maidenhead (as the consultation material states that "*the Thames Gateway corridor links through central London to the 'Western Wedge' whose growth opportunities include the wider Heathrow area*"), although any such impacts are unquantifiable without identification of the type of the growth, timing and locational requirements.

5. The consultation material states that the proposal would result in employment growth in the local area and region which would require housing to be 'in place' to accommodate workers of Heathrow (assumed to be prior to the new capacity need i.e. before 2030). This would fall within the delivery period of the emerging Borough Local Plan for the Royal Borough of Windsor and Maidenhead and as such the previous points regarding land pressure is exceptionally important.
6. The Council acknowledges that commuting data shows the following volumes of people travel into the Heathrow area from their household address. This clearly shows in 2011 that the majority of employees commuted from London boroughs followed by some of the boroughs which form part of the former county of Berkshire, including (and accessed via) the Royal Borough of Windsor and Maidenhead. There is no reason why such commuting patterns would fundamentally change in the future and hence a strong concern that a significant proportion of the required level of housing provision would fall upon the borough.

Local Authority	Total
Hounslow	12,712
Hillingdon	8,394
Ealing	5,853
Spelthorne	5,418
Slough	3,565
Richmond upon Thames	1,976
Windsor and Maidenhead	1,861
Runnymede	1,781
Bracknell Forest	1,204
Surrey Heath	1,163

** Special Workplace Statistics [Commuting Data] – MSOA (2011)*

7. There are some indicators (taken from assessments) that can be used to compare the three options in economic terms:

Comparison of land take associated with the three runway options

	Gatwick Second Runway	Heathrow Extended Northern Runway	Heathrow North Western Runway
Dwellings to be demolished	168 (+37 for surface access)	242 (+ 165 for surface access)	783 (+ 289 for surface access)
Economic benefit for UK	0.2 – 0.6% on GDP	0.4 – 1.0% on GDP	0.5 – 1.0% on GDP
Land take overall *	624 – 702.2 ha	335.7 – 723.8 ha	568.8 – 905.9 ha
Land take within RBWM *	0 ha	38.8 – 66.4 ha	0 ha
Land take Agricultural grades 1-3 *	200.6 ha	96.1 ha	200.6 ha
Additional jobs by 2030*	200 – 23,600	47,400 – 96,200	47,400 – 112,400
Additional households by 2030 (for all employees)*	150 – 18,400	22,900 – 60,600	29,800 – 70,800

* Note that the figures for jobs and households are so diverse because the commission uses five different scenarios for future world development, as shown below.

Assessment of need (AoN): This scenario is consistent with the forecasts underpinning the Commission's Assessment of Need. Future demand is primarily determined by past trends and the central projections published by sources such as the Office for Budgetary Responsibility, OECD and IMF.

Global growth (GG): This scenario sees higher global growth in demand for air travel in the future. It adopts higher passenger demand from all world regions, coupled with lower operating costs and assumes any actions to manage carbon emissions from aviation are taken at the global level.

Relative decline of Europe (RDE): This scenario sees higher relative growth of passenger demand in emerging economies in the future compared to the growth in the developed world. It adopts higher passenger demand from newly industrialised and developing countries, a strengthened position of Far and Middle Eastern aviation hubs and airlines, and assumes any actions to manage carbon emissions from aviation are taken at the global level.

Low-cost is king (LCK): This scenario sees the low-cost carriers strengthening their position in the short-haul market and capturing a substantial share of the long-haul market. As with global growth, it also sees higher passenger demand from all world regions, lower operating costs, and assumes any actions to manage carbon emissions from aviation are taken at the global level.

Global fragmentation (GF): This scenario sees economies close themselves off by adopting more interventionist national policies. As a result, there is a decline in passenger demand from all world regions, coupled with higher operating costs and no global carbon agreement is reached, leading to UK introducing unilateral measures on carbon emissions from aviation.

*

- Lower figure is land take for airport purposes.
- *The higher figure for Gatwick also includes land take for surface access.*
- *The higher figure for Heathrow also includes land take for surface access & flood storage.*
- *The figure for agricultural land is for all these uses combined.*

8. The Council acknowledges that the “Low cost is king” scenario tends to produce the highest estimates of impact, and “global fragmentation” the lowest. The Council believes that the ‘real answer’ will be somewhere in the middle.

9. With regard to housing, the commission states that:

“The average additional housing need for each local authority would be between 200 and 500 homes per year under the Heathrow North West Runway scheme or up to 400 per year under the Heathrow Extended Northern Runway scheme.”
and;

“It is clear that the additional housing needed at the upper end of these ranges – an average of some 400 to 500 homes per year in each of 14 local authorities – may be challenging to deliver, especially given that many local authorities struggle to meet current housing targets.”
but that;

“The rate of provision of additional housing is not significantly out of line with many existing plans for the period to 2026 or with the rate of growth envisaged in the London Plan.”

10. There is no obvious mention of the need to re-provide for demolished homes, or where they would go. The consultation documents include many generic statements about how the actual impact on housing demand would be likely to be lower than the maximum figures, with various possibilities mentioned about changes to the rates of out-commuting, economic activity and other factors. These are not analysed in detail and would need significantly more analysis were they to be relied upon as a predictor of future impact.

11. Similarly for commercial land, the commission makes various generic statements about increased demand but these are not quantified or examined in any detail, so cannot be relied upon as a predictor of future impact.

12. In general, for both housing and business there are generic statements in the consultation documents about likely impact but little hard information. Significant potential impacts are flagged up but specifics are not identified. The Council believe that more information is required on how these points are to be addressed, for instance increased levels of house building would require significant revision to national and local green belt policy, and there is no guarantee that this could be achieved.

13. In the Council's view, there is not enough information about the likely impacts of the proposals and particularly on how they could be addressed at a local level and it would appear that the negative impacts for the borough would outweigh the positive. This is especially true given that, although the negative impacts (including extra demand for housing, commercial premises, green belt, land take) are listed in the analysis, there is no real consideration of how those impacts could be addressed and so this is an area of great unknown. Significantly more information is required on how the impacts could be addressed, before the council could sensibly adopt any other position.
14. The two Heathrow options appear to provide greater impact as well as greater benefit than that proposed at Gatwick. Regrettably the wider economic benefits identified at Heathrow, such as job creation, are likely to have significant negative environmental effects at a local level, which in the Council's view outweigh any benefits. It would appear that the trade off between benefits and impacts is more balanced in the Gatwick scenario.
15. Consideration should be given to Preferred Policy Option EC 1 Economic Development and EC 3: Other Sites and Loss of Employment Uses of the Borough Local Plan (Preferred Options, January 2014) and Policy E5: Loss of land in Employment Areas, Policy E7: Inappropriately Located Uses, Policy E10: Design and Development Guidelines and Policy CF 1: Protection of existing facilities of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003). These policies are all relevant to the use of business premises or re-provision of lost business accommodation.

Tourism

16. There is no obvious consideration of the impact of the proposals on tourism. Enhanced access to the area would make it easier for international tourists to access attractions, but the increased noise and disruption from aircraft would make those attractions less attractive (e.g. more noise at Windsor or Runnymede, leading to reduced demand from tourists). Tourism plays a significant part in the Royal Borough of Windsor and Maidenhead's economy and the commission consider the impact on this sector in a manner that is cursory at best.
17. Consideration should be given to TM 4: Visitor Facilities of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003) and Preferred Policy Option TM 1: Tourism Development the Borough Local Plan (Preferred Options, January 2014).

Local Enterprise Partnership (LEP)

18. The Council is an active partner of the Thames Valley Berkshire and is aware that the LEP has adopted a Strategic Economic Plan¹. The Council notes that the Thames Valley Berkshire LEP states that:

“The significance of internationalisation owes much to the proximity of Heathrow Airport which – although outside our boundaries – is crucially important. Most immediately, Heathrow Airport is a major employer: over 18,000 of our residents currently work at the airport (and just in terms of the scale of employment, it is worth noting that this is equivalent to almost a third of the IT services sector within TVB). Proximity to Heathrow Airport is therefore – in economic development terms – a substantial asset. But we must reflect on whether we are ‘sweating’ this locational advantage as hard as we might.”

19. Although such inclusion within the Thames Valley Berkshire LEP is not believed to jeopardise any views that the Royal Borough of Windsor and Maidenhead may wish to have individually.

RBWM Comments – Surface Access

Transport and Sustainable Transport Plan

1. The supporting consultation material states that the proposals at Heathrow would be of benefit to the business clusters along the M4 corridor and beyond through improved connectivity to growth markets.
2. It must be acknowledged that such proposals are likely to have significant emission impacts and additional highway movements resulting from greater travelling distances of employees (when they are displaced into the surrounding administrative (suggested 14 authority areas) or through the anticipated increase in housing stock to meet increased employment demand around Heathrow.
3. The Borough acknowledges this demand should be viewed against the backdrop of significant improvements to more sustainable transportation methods, such as by Western rail access to Heathrow (WRAtH) (providing improved connectivity for passengers from the West i.e. Twyford, Maidenhead, Slough and Reading), Piccadilly line upgrades, Crossrail (connecting development along the east-west axis, as identified in the London Plan by connecting the Western Wedge to the Thames Gateway) and HS2 (connecting London, Birmingham, Leeds and Manchester).

¹ <http://thamesvalleyberkshire.co.uk/Portals/0/FileStore/StrategicEconomicPlan/TVB%20SEP%20-%20Strategy.pdf>

4. The supporting consultation material states that such additional linkages are likely to 'substantially alter the role played by airports' in terms of *"expanding the economic benefits nationally and locally, increasing airport catchment areas and having an effect on the composition and size of local communities and businesses."*
5. The Council consider that the highway and infrastructure impacts of any proposals are key considerations and that the proposals must provide to the commission and key stakeholders appropriate mitigation to any anticipated negative impacts on the highway network. Such changes should also aim to enhance the 'quality' and 'sense of place' within the area. Generally access from the west of Heathrow is perceived to be 'awkward', which is only likely to be further exacerbated (without results of schemes such as rail improvements & M4 smart motorway scheme being known), if growth is expected in the area in the future.
6. Consideration should be given to Policy T 1 Major Highway Improvements and Policy T 5 New Developments and Highway Design of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003) and Preferred Policy Option INF 2 Sustainable Transport and INF 3 Planning Obligations and Developer Contributions of the Borough Local Plan (Preferred Options, January 2014).

Heathrow Options:

7. Heathrow is situated in a very constrained and congested part of the UK – the strategic road and rail network are currently under enormous stress, with significant levels of overcrowding on trains into London Paddington and Waterloo, and the M4 and M25 experience some of the highest incidence of delay and poor journey time reliability in the UK.
8. Although the airport is well-served by rail services to London, including the Piccadilly Line, Heathrow Connect and Heathrow Express, passengers arriving from the west must change trains at Paddington or Hayes and Harlington. This interchange carries a significant penalty for passengers, particularly those travelling with luggage, and is therefore a major deterrent to travelling to the airport by train.
9. A significant increase in rail capacity is already planned as a result of:
 - Reading Station Enhancement
 - Great Western Mainline electrification
 - Inter-City Express Programme
 - Crossrail
 - Western Rail Access to Heathrow
 - Thameslink
 - Southern Rail Access to Heathrow (subject to the outcome of the current Network Rail Route Study)
 - Refurbished Piccadilly line trains
 - Signalling enhancements

10. The proposed interchange at Old Oak Common will also improve opportunities for rail interchange between the Great Western Main Line, Crossrail, High Speed 2 rail link and Heathrow Express, facilitating rail travel to the airport from many parts of the UK.
11. The decision by the Airports Commission to consider the Heathrow Hub interchange separately from the runway proposals is welcomed, since it only serves to confuse the situation. The interchange would create an additional stop on the Great western Main Line, which would lead to unwelcome delay for commuting and other trips into between London Paddington and destinations across the Thames Valley.
12. It is worth noting however that such proposals need to be considered from a planning policy perspective, which is not possible at this stage due to the lack of supporting information and the extent of the land take associated with the growth and displacement of existing land uses.
13. The proposal for improving Southern Rail Access to Heathrow is welcomed. Having multiple rail lines into the airport would certainly improve the overall resilience of the rail network serving the airport, as well as providing access for those employed at and travelling from the airport who live in communities to the south of Heathrow, and who are currently excluded from travelling to the airport by train.
14. Delivery of the above improvements to rail access to Heathrow is broadly welcomed as it will deliver significant opportunities for mode switch from car to train for local journeys from Maidenhead, Windsor and Ascot, as well as for longer-distance trips. It would be reasonable to expect a significant increase in rail use for travel to and from the airport and given the current capacity constraints on the rail network, however the mechanisms to encourage and deliver this modal shift need to be clearly defined by the proposers before conclusions can be made. Furthermore, the above measures should be delivered as quickly as possible, regardless of whether another runway is delivered at the airport or not.
15. However, it is noted that under both Heathrow expansion options, there is forecast to be severe overcrowding on some rail services to the airport by 2050, particularly the Piccadilly lines in Central London. Although this would appear to be largely as a result of background demand, any significant contribution to the overcrowding on the rail network would be unwelcome. Further work is therefore necessary to consider options to alleviate this overcrowding.
16. Significant overcrowding is also forecast on the Windsor Lines into Waterloo in future year scenarios. This does not appear to be addressed by any of the proposals. Benefits from the Southern Rail Access to Heathrow scheme for passengers and staff travelling to and from the airport, must be set against the loss of ability to use the train paths that would otherwise be used to meet growth in background commuter demand on the Windsor Lines into Waterloo. Further work is therefore necessary to consider options to alleviate this overcrowding.

17. A significant increase in capacity on the strategic road network will be delivered as a result of:

- M4 Smart Motorway J3-12 (already planned)
- M25 and M4 widening in the vicinity of the motorway

18. However, the Airports Commission acknowledges that further M4 widening may be needed under some scenarios. This would be a major engineering project that would have considerable impacts on adjacent communities and greater certainty should be sought on this issue.

19. The Scheme Promoter has suggested a range of demand management measures that could be implemented to reduce levels of airport road traffic, such as congestion charging and incentives for employees to car-pool or switch modes. These have not been presented to the Commission in sufficient detail to form part of the appraisal, and it is therefore unknown as to whether they would be effective in mitigating any increase in airport road traffic. Further work is therefore necessary to quantify their potential impacts.

20. There are likely to be significant additional impacts associated with passenger and workforce travel on the local road network. As previously highlighted, as an adjacent local authority, there will be pressure for the Royal Borough to accommodate a significant proportion of the housing for the enlarged workforce. With predictions of up to 112,400 more people employed at the airport, increased commuting trips to and from the airport will have knock on implications for local transport networks making it necessary to deliver new and improved infrastructure. Further work is needed to ensure that these impacts are properly assessed and appropriate mitigation measures identified where there is likely to be a material impact on local transport networks.

21. The airport's employment catchment is likely to be significantly enlarged as a result of improvements to strategic road and rail networks, which will create additional travel through the Royal Borough, as well as journeys. Air Quality Management Areas have already been declared around the M4 motorway at Bray and the M25 at Hythe End. The likely impacts of additional airport traffic on these AQMAs needs to be better understood and mitigation measures must be put in place where there is likely to be a detrimental impact.

22. Expansion at Heathrow is likely to be highly beneficial to the air freight sector. The availability of more runway capacity provides the potential for enhanced freight capacity on existing freight routes, as well as the creation of new routes. Therefore, it is likely that there will be a significant increase in freight traffic associated with the airport. The impacts on the local road network and adjacent communities need to be fully assessed and mitigated.

23. There are already concerns about the number of lorry movements on local A-roads, such as the A308 and A330 in Holyport, and the additional demand from freight traffic associated with the airport (potentially as much as a doubling of freight traffic) is likely to exacerbate the situation, even allowing for dispersal of vehicles away from the site. Further modelling work is required to better understand the likely impacts on local transport networks and substantial mitigation measures are likely to be required to address the impacts.

Gatwick Option:

22 Gatwick has excellent rail connections with direct access to nearly 130 rail stations. With planned improvements, this will increase to 175 stations. Additional rail capacity can be delivered through the following schemes:

- Gatwick Station capacity enhancements
- Gatwick Gateway Interchange
- Gatwick Express to London Victoria
- Thameslink direct services to Gatwick
- Better services to Guildford, Reading and Oxford
- Better links to Kent and South Coast destinations
- Links to HS2 at Old Oak Common
- Links to Crossrail 2 at Clapham Common

23 The Thameslink service is perhaps the most significant of these, allowing trains to operate between the airport and London every 2.5 minutes. Network Rail is satisfied that increases in both commuter and air passenger rail trips up to 2040 can be accommodated with better performance and less crowded peak hour trains than today. However, with only one rail line to the airport, resilience is not as good as for Heathrow.

24 Rail travel to Gatwick from the Royal Borough is currently unattractive relative to equivalent car journeys. It would become marginally more attractive if the North Downs line were to be electrified and if the service frequency to Reading were to be enhanced as is proposed. The Old Oak Common interchange will offer an alternative rail route to the airport.

25 With proposed improvements to bus and coach access over and above the improvements to the rail network, it is reasonable to expect that there will be a significant mode shift from road to public transport for travel to and from the airport and Gatwick's target of 60% of trips to the airport by public transport appears achievable.

26 Planned investment on the M23 / M25 will deliver a significant increase in road traffic on strategic road network:

- M25 Dartford free flow crossing
- M25 Smart Motorway J5-7
- M25 Controlled Motorway J7-8
- M23 Smart Motorway J8-10
- A23 widening

27 Additional improvements proposed for J9, including slip road widening and grade separated flyover for the southbound slip, would double capacity and improve access from the strategic road network. Again, further modelling may be required to assess the impact on the local road network, but this is not of significant interest to the Royal Borough.

RBWM Comments - Noise

1. The Borough has many villages and towns within the current 57dB noise contour (the metric currently used to assess noise impact from take-off and landings at the airport). These include: Windsor, Eton, Datchet, Wraysbury and Old Windsor. In addition, communities such as Ascot, Sunningdale and Sunninghill have been frequently disturbed by aircraft noise during the recent future airspace trials.
2. It should be noted by the Commission that these communities and indeed those within other local authorities represented at the Local Authority Aircraft Noise Council (LAANC) do not perceive the current noise climate at Heathrow airport to be acceptable. Many of these communities are subjected to noise above levels prescribed by the World Health Organisation and are deprived from basic amenities, such as being able to use their gardens or public spaces.
3. Both Heathrow schemes proposed would see the capacity rise at the airport with number of air traffic movements (ATMs) increasing (subject to planning permission) from 480,000 to over 700,000. Such an increase, despite various assertions to the contrary from the Heathrow promoters, would see these communities (and new areas) subjected to an increase in noise, thus exacerbating the current lack of amenity.
4. Furthermore, the information regarding predicted noise levels (supplied by the proposers) is provided on a large geographic scale, which is not sufficient for communities to be able to properly assess the precise impact at a local community level. The Borough would recommend this information be provided for each local community within a 55dB contour of the airport – detailing the specific changes associated with each option for: noise increase, aircraft height and frequency of overflights.

5. However, as a crude measurement, using the noise contours provided within the commission's 'Noise: Local Assessment'; the following local impacts can be approximated:

Predicted Increase in Local Noise Levels (LAeq_[16hrs] Metric)

LAeq (16hrs)	2030 Do Min.	Hub	North West
Datchet	60	66(+6db)	62(+2db)
Eton	56	62(+6db)	59(+3db)
Windsor	54	59(+4db)	58(+3db)
Old Windsor	58	58	58
Wraysbury	62	63(+1db)	62

*(Airports Commission – Local Noise Assessment [Jacobs 2014])

N70 – Predicted increased number of noise events (n>70dB in a 24hr period)

N70	2030 Do Min.	Hub	North West
Datchet	50-100	200(+150)	100-200(+100)
Eton	20-50	100-200(+180)	100(+80)
Windsor	20-50	50-100(+80)	20-50
Old Windsor	50-100	50-100	50-100
Wraysbury	100-200	200(+100)	100-200

*(Airports Commission – Local Noise Assessment [Jacobs 2014])

6. Due to the manner in which noise is calculated, a +3dB increase in sound pressure equates to a doubling of perceived noise. To consider either proposal, which could see as much as a +6dB increase in noise to those communities, is not acceptable.
7. It should also be noted that many of the mitigating arguments put forward by the promoters highlight assumptions in likely fleet improvements, which is argued may result in improvements in noise emissions. The Borough does not believe that such assumptions can be accepted as a mitigation measure, due to their aspirational nature. Furthermore, many commentators note that improvements in engine performance can only deliver a limited noise benefit, when indeed a primary source of noise (particularly on landing) is the limited design of the fuselage.
8. Owing to the absence of firm mitigation measures that can actually be delivered by the airport (rather than hoping airline operators will modernise their fleet at a faster rate than currently experienced), the Borough recommends that the Commission reduce the weighting currently being given to 'fleet improvements' (as a noise mitigation measure) in its appraisal methodology.

9. Attention must also be drawn to the likely future operations (particularly flightpaths) that a third runway Heathrow would necessitate. The supporting documentation provided by National Air Traffic Services (NATS - relating to the Airport Commission's Appraisal Module 14 – annex 4&5) sets out a number of indicative flightpaths the airport could use. It is worth noting that all of these indicative flightpaths are likely to cause a significant deterioration in quality of life (attributable to noise & annoyance) for the communities overflowed and on this basis, the Borough cannot support their introduction.
10. Perhaps the predominant factor in this deterioration of amenity, is the lack of respite afforded to communities. Currently, the airport is prohibited from mixed-mode operations (whereby aircraft land & take-off on the same runway), allowing residents half a day respite (on westerly operations only currently – due to the Cranford Agreement still being in effect).
11. The indicative operating methods provided, highlight that for the Heathrow schemes, runways will have to operate in mixed mode. The results of this form of operation would be disastrous for communities, such as Old Windsor (at the end of the Southern runway) whose respite would be halved (compared to current levels) to around 4.5 hours a day. Such continued exposure to aircraft noise would be intolerable for these residents and should not be considered under any circumstance.
12. It must be highlighted to the commission the high value in which Borough residents & those in neighbouring communities place upon predictable respite. To consider reducing the amount of time in which aircraft are not flying overhead is unacceptable.
13. It is also paramount that the Commission's recommendation should not be calculated & based on population and population density statistics alone. As with any investigation into noise nuisance; the time, frequency, duration, nature and severity need also to be taken into account – particularly when assessing the likely impact to the more rural communities to the west of the airport (who experience a much lower background noise level to other London-based communities). With lower noise levels, the introduction of increased ATMs will be much more pronounced, resulting in increased disturbance to these communities.
14. This fact can be illustrated by the community response to the recent Future Airspace Trials over Ascot, Sunninghill & Sunningdale; whereby thousands of resident complaints were made to the airport as a result of new ATMs overhead. This is particularly prevalent with both options at Heathrow seeing a significant increase in overflights to several key rural communities, such as: Datchet, Eton, Eton Wick and potentially Bray. Many of these communities have not perceived the impact of significant overflights before.

15. Given that whole swathes of the Thames Valley and London will be affected for the first time by flight path noise and areas already affected risk losing respite periods; to not have firm operating flight path proposals at this stage is unacceptable. This is especially relevant, owing to expansion (which may indeed involve plans for further runways) up to 2050 likely to exceed WHO noise levels, as previously highlighted
16. It is the opinion of the Borough that before any recommendation is made, that the commission also properly investigate the highly subjective topic of annoyance, in an attempt to both quantify and properly understand the effects of aircraft noise, rather than relying on one of the noise matrices currently being put forward.
17. The ANASE (Attitudes to Noise from Aviation Sources in England) study, which broadly found that the 57dB contour had become widely out of date and was in need of recalibration in order to fully assess the onset of significant community annoyance. It is therefore strongly recommended that an independent study is commissioned to this effect. Such a study should also reflect the daytime noise guideline for outdoor environments, as established by the World Health Organisation (WHO) for outdoor spaces at 55dBA LAeq(16hrs).
18. The WHO, in its 1999 Community Noise and 2009 Night Noise Guidelines, reiterate the need for an indoor level of 35dB and outdoor level of 55dB to be achieved. Failure to achieve these can correlate to the onset of hypertension (high blood pressure) in adults (in addition to other cardiovascular effects) as well as reduced cognitive performance within school children.
19. In an apparent attempt to address this factor, Heathrow Airport Limited in their proposal have allocated a fund of circa £550m for noise insulation & mitigation. It is not clear however how this figure has been calculated and indeed how it plans to be used. The Borough would suggest that the commission need to firstly ensure a full & proper study into mitigation needs is conducted before any figure is derived – as this may carry particular pressure on the financial deliverability of the proposals before it. Such a study should ensure that all recipients requiring financial assistance to achieve WHO levels within their home receive it.
20. Many of the aforementioned health effects are made worse by the disturbance of sleep patterns on a continued basis. This raises the question as to the suitability of Heathrow Airport to operate Night Flights.
21. Within the Heathrow supporting documentation (Taking Britain Further: Vol 1), the airport states that the airline community using the airport requires the existing night time slots to remain in perpetuity. HAL state that these will indeed remain should a third runway be decided upon, however with a rotation policy of one runway each week operating such flights. This mechanism is designed in an attempt to afford the other two 'runway communities' respite for 2 weeks out of three. As mentioned previously, without detailed modelling and flight path information, it does not appear likely that such a separation in noise impact can be achieved from the proposed two northern runways.

22. The Borough therefore maintains its position that, night flights & expansion of ATMs at an airport which already overflies three times as many people as its nearest European competitor is completely unacceptable.

EU Airport	Population exposed to EU 5dB LDEN metric (2006)
Heathrow	725,500
Frankfurt	238,700
Paris (Charles de Gaulle)	170,000
Amsterdam (Schipol)	43,700
Madrid Barajas	43,300

**(Airports Commission – Discussion Paper 5, 2013)*

23. In order for key stakeholders (including members of the public) to properly assess the aforementioned local impacts; information such as detailed flight paths, local noise impacts, ATMs and aircraft night need to be made readily available and specific to those communities in order for an informed response to be made.

RBWM Comments – Air Quality

1. Firstly, it must be highlighted that the proposers have not submitted any detailed air quality modelling, making it impossible for Local Authorities and indeed the Commission to conclude the risk that this factor presents.
2. Surface access congestion is the predominant source of adverse air quality in the Royal Borough, with an Air Quality Management Area having been declared around J13 of the M25 near the village of Wraysbury, demonstrating that levels at this location are already exceeding NO₂ European Union Limit values at this location.
3. This junction forms a critical part of the Heathrow Proposer's surface access plans for both increased passenger numbers and staff, with construction work pre-2030 and use post-2030 beginning from this junction and heading northwards towards the interchange with the M4.
4. However, even without reviewing the missing air quality modelling & subsequent surface access mitigation (for traffic accessing the airport - staff and passengers); to consider adding any further demand to areas that are already breaching limit values, would not only be irresponsible, but would increase the risk of detrimental health effects being observed – such as those members of the public with existing respiratory conditions.

5. This factor is further highlighted within the 2003 Aviation White Paper, highlighting that indeed Heathrow could be a preferred site for additional runway capacity, if weren't for the serious concerns in relation to Air Quality . Since 2003, local congestion in the area has got worse, with air quality deteriorating as a result. Both schemes do not acknowledge adequately the current unacceptable levels of congestion in the area and the demand from the EU to expedite the reduction of these levels (or face legal action).
6. The concerns with regard to air quality go wider than the M25 however, with local roads potentially serving as alternative routes at times of congestion. This is due to other alternative arterial roads, such as A308, likely to serve as a relief road at times of high congestion. This factor is particularly prevalent due to the A308 (at peak times already congested) passing through two further AQMAs in Bray and Windsor.
7. Acknowledging that any proposals of this nature are likely to have an impact upon the air quality of the surrounding area, the following policies should be considered:
 - *“The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account” (para. 120, NPPF).*
 - *“Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan” (para. 124, NPPF).*
 - Consideration should also be given to Policy NAP 1: Road/rail noise and development, Policy NAP 2: Aircraft noise and housing development and Policy NAP 3: Polluting development of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003) and Preferred Policy Option EP 1: Environmental Protection, EP 2: Air Pollution and EP 4: Noise of the Borough Local Plan (Preferred Options, January 2014).
8. The extent to which local roads will become congested, depends very largely on the manner in which public transport is utilised for journeys to and from the airport. This is discussed further within our surface access considerations, however the Borough recommends that the commission set out a further detailed feasibility study, specific to local road networks, in order for the likely air quality impact to be better forecast.

RBWM Comments - Biodiversity

Bird strike

1. The Council notes that the supporting consultation material makes reference to the impacts that the change of land uses from existing to those proposed as part of this consultation will have upon bird strike, which is known to be of concern with the proximity of the existing airport to existing land uses. The Council holds concern over these proposals as the expansion of Heathrow towards a group of existing water bodies both within the administrative areas of Slough and the Royal Borough of Windsor and Maidenhead (and primarily towards the Queen Mother Reservoir and many surrounding water features in Wraysbury located within our administrative area) is only likely to exacerbate the risk and frequency of these issues.
2. In particular it should be noted that a number of these water features are designated as the South West London Waterbodies Special Protection Area (SPA). This SPA is designated owing to its importance as a feeding and roosting site for wintering wildfowl, in particular Gadwall (*Anas strepera*) and Shoveler (*Anas clypeata*). Given that the characteristics of these water bodies are particularly attractive for these rare and vulnerable birds, it is considered that the likelihood of bird strike in this location would be highly significant.
3. It is unclear what avoidance or mitigation is proposed by the Airports Commission to overcome such concerns (upon which Natural England and other relevant consultee bodies are also likely to have views). At this stage it is assumed by the Council that changes may need to be made to these water bodies in terms of depth, layout, etc if mitigation is deemed necessary as a result of developing runways in close proximity. Off-site provision may also need to be made to replace and compensate for any lost habitats, and it is noted that this could only be done if an IROPI test (Imperative Reasons of Overriding Public Interest) was satisfied. The nature and extent of any required mitigation proposals are as yet unknown and hence it cannot be ascertained whether any proposed measures would comply with the legal requirements relating to the SPA.
4. Any physical works that would require importation of inert wastes into the area are likely to have significant impacts upon the Royal Borough of Windsor and Maidenhead highways network, environment, flood risk, use of land and general environmental quality. Any changes which are proposed to any existing water features could have significant implications upon the biodiversity within the area, and the Royal Borough of Windsor and Maidenhead would oppose any adverse effects.
5. The Council assumes that the Airports Commission will seek further views of the Environment Agency (as the statutory consultee for such matters), as the proposals become more specific in terms of identified land take, proposed design and use and potential resultant impacts and mitigation.

Environmental impacts and landscape

6. The supporting consultation material makes numerous references to the probable impacts that the proposals at Heathrow would have upon existing environmental designations. The Council is concerned over the potential impacts that the proposals may have upon the existing designations identified within the Royal Borough of Windsor and Maidenhead.
7. Whilst the Council acknowledges that the proposals do not identify all land takes of the anticipated associated growth as a result of the proposal (such as that expected to be required for displacement of existing land uses and anticipated expansion resulting from the growth of Heathrow), due to the lack of clarity of these potential impacts the Councils wishes to identify those designations which are of significant concern, especially if they were directly or indirectly lost or impacted upon. These designations are as follows, and relevant planning policies are highlighted:
 - a) Special Protection Areas (SPAs). Two SPAs are of relevance to these proposals. The South West London Waterbodies SPA is very close to Heathrow and provides a habitat which forms a feeding and roosting site for wintering wildfowl, with consequent concerns over bird strike for expanded airport operations. This point is explained more fully elsewhere.
 - b) The Thames Basin Heaths SPA is a large, fragmented area of some 8,400 hectares that is designated for its value as habitat for three protected bird species. Under the Habitats Regulations, development proposals must not give rise to adverse effects on the integrity of the SPA either alone or in combination with other proposals. If it is likely that such effects will occur, then measures must be secured to remove the impact or planning permission be refused. In practice this severely limits the ability of the southern part of the borough to absorb any further increase in housing, meaning that any extra pressures created by the Heathrow proposals would be concentrated in other areas. – Consideration should be given to Preferred Policy Options NE 1: Nature Conservation and NE2: Thames Basin Heaths Special Protection Area of the Borough Local Plan (Preferred Options, January 2014) and NRM6 of the South East Plan.

Consideration should be given to Preferred Policy Option NE2: Thames Basin Heaths Special Protection Area of the Borough Local Plan (Preferred Options, January 2014) and Policy NRM6 of the South East Plan.

- c) Green Belt - Consideration should also be given to Preferred Policy Option GBC 1 Green Belt, GBC 2 Countryside Character, GBC 3 New Residential Development in the Green Belt of the Borough Local Plan (Preferred Options, January 2014) and Policy GB 1: Acceptable uses and development in the Green Belt, Policy GB 2: Unacceptable development and Policy GB 3: New residential development of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003).

- This proposal at Heathrow appears to be contrary to the reason that 83% of the authority is designated part of the Metropolitan Green Belt; which was initially to protect open land and avoid the uncontrolled growth of large cities into the countryside. As such, if the development is, as suggested, anticipated to result in additional land take in the 'local area' and region, this places considerable development pressure upon the South East and especially Berkshire and Buckinghamshire (due to their proximity to Heathrow).
- d) Areas of Special Landscape Importance - Consideration should be given to N 1 Areas of Special Landscape Importance of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003).
- e) Setting of the River Thames - Consideration should be given to Policy N 2: Setting of the Thames of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003).
- f) Scheduled Ancient Monuments - Consideration should be given to Preferred Policy Option HE 3: Scheduled Ancient Monuments of the Borough Local Plan (Preferred Options, January 2014) and Policy ARCH 1: Development on Scheduled Ancient Monuments of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003).
- g) Local heritage Assets - Consideration should be given to Preferred Policy Option HE 4: Archaeology, HE 7: Non-Designated Heritage Assets of the Borough Local Plan (Preferred Options, January 2014).
- h) RAMSAR and Local Wildlife Sites – Consideration should be given of the Borough Local Plan (Preferred Options, January 2014)
- i) Special Protection Areas, Special Sites of Scientific Interest (SSSI), Biodiversity Opportunity Areas and Biodiversity Action Plan (BAP and Special Areas of Conservation – Consideration should be given to Preferred Policy Options NE 1: Nature Conservation and NE2: Thames Basin Heaths Special Protection Area of the Borough Local Plan (Preferred Options, January 2014) and retained Policy NRM6 of the South East Plan.
- j) Historic Park and Gardens - Consideration should be given to Preferred Policy Option HE5: Registered Parks and Gardens of the Borough Local Plan (Preferred Options, January 2014)
- k) Public Rights of Way – Consideration should be given to Preferred Policy Option NE5: Rights of Way and Access to the Countryside of the Borough Local Plan (Preferred Options, January 2014)
- l) Tree Preservation Orders – Consideration should be given to Preferred Policy Option NE3: Trees, Woodlands and Hedgerows of the Borough Local Plan (Preferred Options, January 2014)

- m) Existing services (telephone, water, electric, gas and sewerage) – Consideration should be given to Preferred Policy Option INF4: Telecommunications and INF5: Water Supply and Sewerage Infrastructure of the Borough Local Plan (Preferred Options, January 2014)
- n) SANG (Suitable Alternative Natural Greenspace) – which are areas identified for mitigation to ensure that new additional residential development granted consent within proximity to the SPA does not result in a significant effect on the ecological integrity of the SPA – Consideration should be given to Preferred Policy Option NE2: Thames Basin Heaths Special Protection Area of the Borough Local Plan (Preferred Options, January 2014) and retained Policy NRM6 of the South East Plan.
- o) Minerals Safeguarding Area (MSA) - Consideration should be given to Policy 2 of the Replacement Minerals Local Plan for Berkshire and to Preferred Policy Options NR1: Minerals Strategy and NR2: Minerals - Preferred Areas of Future Working of the Borough Local Plan (Preferred Options, January 2014)
- p) Conservation Areas and Listed buildings – Consideration should be given to Policy CA 1: Development in Conservation Areas, Policy CA 2: Guidelines on Development affecting Conservation Areas and Policy LB 2 Proposals affecting Listed Buildings or their settings of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003) and to Preferred Policy Options HE 1: Historic Environment, HE 6: Conservation Areas and HE 2: Listed Buildings of the Borough Local Plan (Preferred Options, January 2014).
- q) Designated Crown land – Windsor Castle – Consideration should be given to Chapter 11: Historic Environment of the Borough Local Plan (Preferred Options, January 2014)
 - It is unclear how much the Royal Borough of Windsor and Maidenhead will be directly affected by the proposals especially in terms of land take requirements for indirect growth in housing and commercial development but it is acknowledged that the following are likely to impact:
- r) Displacement of existing land uses for airport land i.e. housing, commercial, industrial (i.e. households of Poyle, Slough)
- s) Displacement of existing land uses dependant upon detailed route and construction design of the surface areas.
- t) Increased demand for more developed land i.e. housing, commercial, industrial land uses once expansion plans are implemented (or under construction)
- u) Expansion of Heathrow into the Royal Borough of Windsor and Maidenhead through the Extended Northern Runway proposals
 - Reference is made to how *“technological changes would combine with the impacts of airport expansion to alter the shape and scale of environmental impacts”*. The Council believes that any significant, unmitigated impacts on our iconic and locally important environmental designations would be unacceptable.

RBWM Comments - Water & Flood Risk Concerns

1. The Council raises concerns over the impacts that the proposals and additional demand for those land uses which the Airports Commission perceive to be associated to any Heathrow expansion plans may have upon Flood Zone 2 and 3 (as identified by the Environment Agency). It is expected that consultation would be held between the Airports Commission and Environment Agency and the Royal Borough of Windsor and Maidenhead as the Local Lead Flood Authority, especially where land take is anticipated to occur within the Borough.
2. The Council assumes that the Airports Commission will seek further views of the Environment Agency (as the statutory consultee for such matters), as the proposals become more specific in terms of identified land take, proposed design and use and potential resultant impacts and mitigation.
3. Consideration should be given to Policy F 1: Development within areas liable to flood and Policy NAP 4 Pollution of groundwater and surface water of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003) and Preferred Policy Option NR 10: Managing Flood Risk and Waterways Borough Local Plan (Preferred Options, January 2014).
4. Any planning application proposing development in flood prone areas must be accompanied by a Sequential Test Report demonstrating that there are no suitable alternative sites at a lower risk of flooding available, and this has yet to be demonstrated by the promoter of the Heathrow Airport Northwest Runway (Heathrow NWR) or the promoter of the Heathrow Airport Extended Northern Runway (Heathrow ENR).
5. Both proposals at Heathrow involve construction of raised runways across the flood plains of three major watercourses that are known to be vulnerable to flooding. Internal flooding of habitable property occurred on the Colne Brook flood plain in January and February 2014 and any proposals that may increase flood risk in this area are obviously of major concern to the Borough.
6. Both proposals at Heathrow involve major changes to the fluvial environment resulting in loss of flood plain storage, and the diversion of major watercourses such as the Colne, the Colne Brook and the Poyle Channel, that has potential to increase fluvial flood risk. Culverting of significant lengths of major watercourses is also proposed and clearly has the potential to increase flood risk if the culverts design capacity is exceeded or the culverts become blocked, and will have adverse environmental effects.
7. Limitations in the modelling approach used to assess fluvial flood risk for the Heathrow Airport Extended Northern Runway mean that there is a high level of uncertainty regarding the impacts of the proposed scheme on fluvial flood risk.

8. Both proposals at Heathrow are also likely to modify groundwater flow paths, in an area where groundwater flow paths have already been heavily modified by large water supply reservoirs and historic land fill sites.
9. Construction of the Heathrow Airport Northwest Runway proposals, for instance, include the construction of attenuation tanks estimated to be 10m deep, with a surface area of 11,000m², and construction of a major structure of this nature has the potential to have an adverse effect on the movement of groundwater.
10. Both proposals at Heathrow are located in an area that could be at a significant risk of surface water flooding and it is unlikely that surface water could be drained by gravity systems. Failure to properly attenuate surface water runoff could lead to a significant increase in flood risk to downstream communities which again is an obviously concern to the Borough.
11. The surface water attenuation measures required for the Heathrow Airport Northwest Runway proposal appear to have been significantly underestimated.
12. Potential interaction between watercourses, groundwater and surface water runoff has not been assessed for the two proposals at Heathrow. Significant uncertainties therefore exist regarding the mitigation of fluvial and surface water flood risk, and potential flood risk impacts on downstream (and upstream) communities. This is a great concern to the Borough.

RBWM Comments – Place

Alignment with Local and Regional plans

1. The supporting consultation material states that the proposal aligns well to both local and regional strategies and is justified by the Airports Commission through acknowledgement that the Heathrow proposals would result in significantly increased employment and housing in the surrounding boroughs and by supporting economic development centred on Heathrow. Although, the Council acknowledges that reference is also made to the local economic analysis which suggests that the *“proposals would not be undeliverable but that they will present some challenges”* it is unclear at this stage what ‘challenges’ are being referred to.
2. Although the airport land take may be considered under the National Infrastructure planning application process (and so be subject of National Policy Statements produced by Government), the Council is unclear of the influence and weighting provided to the local plans and allocations through the Airport Commission’s supporting assessments relevant to our administrative area, as there appears to be no clear references to the emerging Borough Local Plan (Preferred Options, January 2014)², the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003)³, saved policy for South East Plan Thames Basin Heaths Special Protection Areas within the supporting consultation material. This seems especially prevalent as part of the proposals for the Extended Northern runway actually encroaches into the administrative area of the Royal Borough of Windsor and Maidenhead.
3. It would also seem prudent to make references to the saved policies from Replacement Minerals Local Plan for Berkshire (RMLP) (incorporating alterations adopted in December 1997 and May 2001)⁴ and Waste Local Plan for Berkshire (December 1998)⁵ which cover the whole former county of Berkshire (now made up of the individual unitary authorities of West Berkshire District Council, Wokingham Borough Council, Reading Borough Council, Bracknell Forest Council, Royal Borough of Windsor and Maidenhead and Slough Borough Council).
4. All of these saved and emerging policies provide an important policy context to any proposed Heathrow expansion and associated residential, commercial, industrial and infrastructure expansion, along with any additional mineral extraction or secondary aggregate demands and waste management provision. These extant Local Plans are supported by a proposals map for the Royal Borough of Windsor and Maidenhead which defines the boundaries of the sites allocated and relevant planning designations identified within these plans, for example, this includes the adopted Green Belt boundaries for the borough.

² http://www.rbwm.gov.uk/web/pp_borough_local_plan.htm

³ http://www.rbwm.gov.uk/web/pp_adopted_local_plan.htm

⁴ http://www.rbwm.gov.uk/web/pp_minerals_waste.htm

⁵ http://www.rbwm.gov.uk/web/pp_minerals_waste.htm

5. Although none of the extant planning policy documents relevant to the Royal Borough of Windsor and Maidenhead make reference to or consideration of the potential expansion at Heathrow, proposals should still be assessed against these extant policies. There are a considerable number of relevant environmental policies detailed within these plans and the National Planning Policy Framework.
6. The Council refutes the statement by the Airports Commission that there is 'sufficient flexibility' within the local economy or that this proposal is a 'relatively small scale change to the existing plans around Heathrow', as suggested within the supporting consultation material. As at this stage not all the impacts of the proposals (and estimated land takes) and anticipated associated growth as a result of the proposal have been considered or identified by the Airports Commission.
7. It is acknowledged that the supporting consultation material makes reference to how proposals at Heathrow could support the wider spatial and socio-economic development strategies. The Council acknowledges that the Airports Commission requests that as part of the response respondents consider how these proposals align with and support their long-term socio-economic development strategies and how any potential risks of the proposals can be effectively mitigated. In this regard the Council's emerging Borough Local Plan (Preferred Options, January 2014) is of relevance, as well as the Thames Valley Berkshire Strategic Economic Plan (SEP)⁶.
8. The Royal Borough of Windsor and Maidenhead do not believe that there are any clear benefits of the proposals at Heathrow when account has been taken for the likely considerable negative impacts from such extensive growth surrounding Heathrow and how this could impact upon a plethora of further relevant planning considerations (which are likely to be impacted upon, even with proposed mitigation measures in place).
9. The Council will now consider the 'increased social and environmental impacts' likely or possible with specific consideration provided to the Royal Borough of Windsor and Maidenhead. These views are formed upon the basis of the information supplied within the supporting consultation documents which generally consider the future capacity and connectivity outcomes for each proposal.

⁶ http://thamesvalleyberkshire.co.uk/Strategic_Economic_Plan

Summary of proposed options at Heathrow (all land take requirements – not specific to the Borough)

The Council broadly summaries the proposed expansion options at Heathrow, as follows.

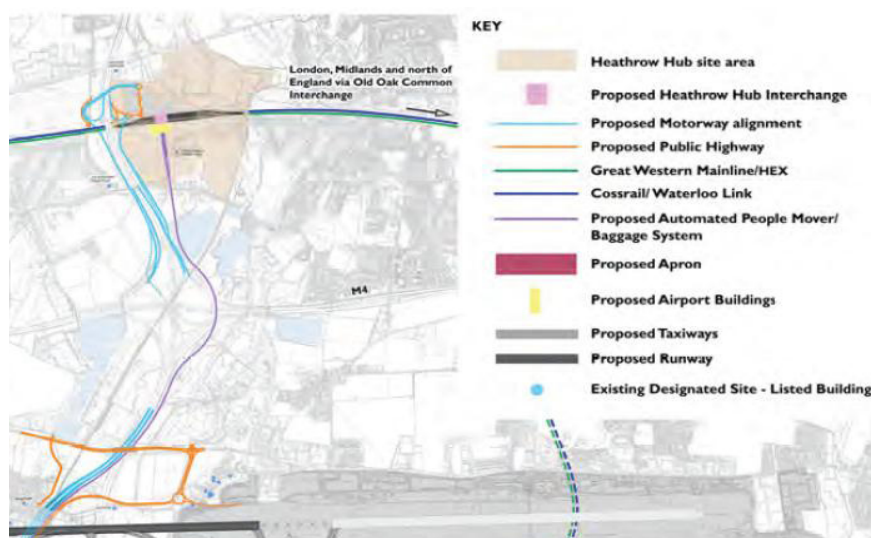
10. Extended Northern Runway proposal would result in:

- New runway and ancillary services total land take 724Ha, plus an additional 330Ha for surface access improvements and 58Ha for flood storage area. Totalling 1,112Ha.
- Loss of existing housing stock (242 residential properties for airport land take) and resultant displacement of families/housing (with a further 165 residential properties potentially impacted by surface access).
- Loss of a number of public open spaces.
- Loss of existing industrial estate and commercial premises (as well as business land) of 74Ha.
- Impact upon infrastructure provision, especially M25 and surrounding/linking infrastructure.
- Diversion or impact upon river course, ground water and surface water flows and potential aquifers.
- Anticipated pressure for new commercial, industrial and housing (lower end housing estimate of 22,900 homes and upper end housing estimate 60,600 homes) proximate to Heathrow.
- Extension of the Heathrow Airport Extended Northern Runway would be into both the administrative areas of Slough Borough Council and Royal Borough of Windsor and Maidenhead.
- Substantial impact upon Green Belt land (approximately 580Ha) through development within and impact upon this land designation. The consultation material highlights substantial impact upon Spelthorne, Slough, Windsor and Hillingdon.

11. North West Runway proposal would result in:

- New runway and ancillary services total land take 569Ha plus an additional 294Ha of surface access improvements and approximately 43Ha for flood storage area. Totalling 906Ha.
- Loss of existing housing stock (783 residential properties within airport land take) and resultant displacement of families/housing (with a further 289 residential properties potentially impacted by surface access).
- Loss of 1 educational building.
- Loss of a number of public open spaces.
- Loss of existing industrial estate and commercial premises.
- Impact upon infrastructure provision, especially M25 and surrounding A-roads.
- Diversion or impact upon river course, surface water and ground water flows and potential aquifers.
- Substantial impact upon Green Belt land (approximately 694Ha) through development within and impact upon this land designation. The consultation material highlights substantial impact upon Hillingdon.

- Anticipated pressure for new commercial, industrial and housing (lower end housing estimate of 29,800 homes and upper end housing estimate 70,800 homes) proximate to Heathrow.
 - Loss of existing energy from waste facility at Colnbrook, Slough (displacement of contracted managed commercial and industrial waste from south east – especially London and some municipal solid waste).
12. Regrettably the consultation material does not set out all of these matters succinctly within the supporting consultation material which would be of extreme benefit to those wishing to consider an overview of the options proposed.
13. The consultation material states that not all land take which is anticipated as a result of the expansion proposals at Heathrow has been identified by the Airports Commission, for example this does not include further requirements for commercial development land south of the perimeter road (due to the separate Heathrow Hub proposal) which is also on top of the land pressures which will result from the development anticipated by the expansion proposals i.e. additional housing, commercial and industrial development. By splitting consultations (and arguably inextricably linked development at Heathrow – as without the housing for the workers, the necessary employees to ensure the smooth operation of Heathrow would not be available) the cumulative impacts of proposals which are clearly interlinked can not be assessed, defined or considered as part of the consultation. Cumulative impact is an important planning consideration, especially in these circumstances.
14. Whilst reference is made to the hub station option for Heathrow, the Council notes that this does not form part of this consultation and so is not accounted for within the supporting consultation material. There is also a lack of clarity over the location of such necessary infrastructure (although suggested to be an extension to the airport site and located on the Great Western Mainline), the supporting consultation documentation suggests that the location would vary for either of the Heathrow proposals, although the Airports Commission states that the hub station option for Heathrow is relevant for both option proposals.



Heathrow Hub proposal

15. The Council is concerned over the consistency and clarity within the supporting consultation materials as there appears to be references to different volumes of land take, for example reference within the consultation material is made to approximately 238Ha and 431Ha of proposed land take which would lie within designated Green Belt which varies to the figures listed above and found elsewhere within the consultation material, which are considerably higher. The Council assumes that some of these figures may relate to airport land requirements only, whilst others may take a slightly broader view and as such the Council are considering the 'worst case' scenario, until the Airports Commission are able to provide further clarity on the preferred approach and anticipated impacts resulting from this.

Green Belt

16. Surface access improvements and flood storage area is quantified at around 390Ha of land in addition to that already identified for the airport land take for the Extended Northern Runway proposal, of which 238Ha is anticipated to be located within designated Green Belt land. This is compared to 294Ha for related surface access improvements and 43Ha for flood storage (in addition to 569Ha for the airport development for the North West Runway proposal. Of this total the Airports Commission anticipate that 431Ha of this would be within designated Green Belt land. Further land take is anticipated through the associated growth as a result of the proposal, which has not been detailed.
17. The Council acknowledges that the proposal would result in land take which is anticipated to be located within Green Belt. This appears to be contrary to the reason that this land was initially identified as part of the Metropolitan Green Belt, which was initially (to protect open land and avoid the uncontrolled growth of large cities into the countryside). If the development is as suggested within the supporting consultation material to be located proximate to Heathrow, so be both in the 'local area' and region, this places considerable development pressure upon the South East and most likely upon Berkshire and Buckinghamshire (due to their access to Heathrow). These two areas are also likely to be pressured for such development, as the consultation material highlights development in the Green Belt, for which the coverage is limited proximate to Heathrow.
18. At this stage it is unclear what direct and indirect impacts may result from this proposal on the Royal Borough of Windsor and Maidenhead, which makes it difficult for the Council to make well-informed judgements or specific comments upon these proposals at this stage. The supporting consultation material states that the proposal will result in significantly increased employment and housing in surrounding boroughs in numerous places.

19. As mentioned, the Council perceive that considerable pressure will be placed upon the South East of England and the Royal Borough of Windsor and Maidenhead to provide additional housing in relation to that shortfall which cannot be provided more proximate to the Heathrow site. This pressure will add to the existing demographic and economic pressures which significantly exceed current planned provision across the region. It is unclear whether such growth can be reliably planned and delivered within the necessary timeframe. It is likely that such additional growth requirements could not be met without building in areas such as the Green Belt and areas at risk of flooding. 87% of the Royal Borough is subject to such constraints..
20. The NPPF is clear that *“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”* (para 83, NPPF). *“As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”* (para 87, NPPF) and *“very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”* (Para 88, NPPF).
21. Consideration should also be given to Policy GB 1: Acceptable uses and development in the Green Belt and Policy GB 2: Unacceptable development of the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003) and Preferred Policy Option GBC 1 Green Belt of the Borough Local Plan (Preferred Options, January 2014). The consultation material highlights that the proposal merits further exploration, and the Royal Borough of Windsor and Maidenhead wishes to reserve its right to make further comments upon this proposal when further detail on the preferred proposal(s) is released.

Cumulative impacts of proposals

22. Only the airport land shown on the plans form part of this consultation (which does not include the likely land take or impacts which would result from surface access works and mitigation works). The Council view all these proposals at Heathrow to be inextricably linked to this consultation proposal) and any additional growth in the area is likely to exacerbate the comments which the Council is already raising within this response.
23. Additional land take and pressures adjacent to, surrounding or proximate to the existing Heathrow site will only result if further loss of existing land uses, such as a potentially greater loss of existing housing stock and existing, established land uses. The Council notes that there is considerable variation between the two proposals at Heathrow with regards to their siting, impacts upon existing land uses and general statistical summary information and such disparities make quantifying or assessing impacts considerably harder.

24. The displacement (and necessary re-provision) of existing land uses is not assessed in detail as part of the documentation supporting this consultation, which does not allow the full impacts on the surrounding area to be considered. The Council considers these likely to have much wider implications on the surrounding landscapes and townscapes and especially directly upon the surrounding administrative authority areas which accommodate the runway land take within Slough, Hillingdon and the Royal Borough of Windsor and Maidenhead.
25. There are further statements within the supporting consultation documentation which make reference to the extent of the defined airport land (which forms part of this consultation) and that it does not include areas for commercial development locally which the Airports Commission anticipate are going to develop around the site. Such further development will result in a greater impact upon the environment, potential displacement of 'low value/revenue' uses being forced out of the area through an uplift and sudden growth pressure for these areas to accommodate 'higher value land uses' proximate to the airport. It can not be assumed that these land uses will not require some element of replacement land into surrounding boroughs, as the location and size of Heathrow dictates that such proposals will have wide-spread impacts, especially for those authorities neighbouring Slough, Hillingdon and Hounslow, such as the Royal Borough of Windsor and Maidenhead.
26. The proposals could have significant impacts upon the number of allocations or sites needing to be identified by the Royal Borough of Windsor and Maidenhead in the emerging Borough Local Plan, such impacts are only likely to exacerbate the current deficiencies of land take or delivery anticipated within the emerging Borough Plan.
27. The Council acknowledge that cumulative impacts are inevitable upon the existing land uses for which the Airports Commission have identified for the proposed expansion. As a result of the extent of expansion plans at Heathrow such development is likely to extend into both Green Belt land as well as Greenfield land which will have a negative impact upon a range of local environmental factors such as landscape, heritage, biodiversity and hydrology.
28. It is unclear in the supporting consultation documentation provided by Airports Commission whether off-site re-provision of the existing land uses is proposed, or in fact whether any provision is to be made for the additional demand for those land uses which the Airports Commission perceive to be associated to any Heathrow expansion plans. The Council is unclear whether such development would be delivered through master planning of the area or whether such expansion and urbanisation of the area will evolve in a more sporadic fashion, via speculative planning applications. The supporting consultation material makes reference to the fact that the proposed land take for the airport allows for some ancillary services and commercial development for the proposed Northern Extension Runway proposal, although it is unclear the volumes accounted for and the volumes which will be required in addition to the figures which the supporting consultation material makes reference to.

29. In summary, the Council believes that the following matters are significant before the Council can be able to make a detailed response:

- Proximity to existing land uses
- Detailed timescale for delivery
- How will delivery be ensured?
- Detailed off-site / on-site mitigation
- Detailed economic / environmental benefits

Land use planning : Housing land

30. With regard to housing, the commission states that:

“The average additional housing need for each local authority would be between 200 and 500 homes per year under the Heathrow North West Runway scheme or up to 400 per year under the Heathrow Extended Northern Runway scheme.”
and;

“It is clear that the additional housing needed at the upper end of these ranges – an average of some 400 to 500 homes per year in each of 14 local authorities – may be challenging to deliver, especially given that many local authorities struggle to meet current housing targets.”
but that;

“The rate of provision of additional housing is not significantly out of line with many existing plans for the period to 2026 or with the rate of growth envisaged in the London Plan.”

31. The Council notes that all of these anticipated projections would be ‘on top’ of the figure for the Royal Borough of Windsor and Maidenhead to meet our objectively assessed needs for housing (relevant to household projections). It should be noted that the Royal Borough of Windsor and Maidenhead has historically delivered 350 additional homes per year and has estimated an ongoing supply of a similar proportion. Increasing provision above this would require the release of land from the Green Belt.

32. Such a concentrated increase of development around Heathrow has to be assumed to be a likely resultant impact of the proposal (as employment at Heathrow airport will dictate that employees will wish to be proximate to allow for a manageable commute) which could result in significant demand on the surrounding authorities in addition to the existing provisions which the Royal Borough of Windsor and Maidenhead Strategic Housing Market Assessment, 2013⁷ has already identified.

⁷ <http://consult.rbwm.gov.uk/file/2801235>
<http://consult.rbwm.gov.uk/file/2831084>

33. The Airport Commissions consultation material makes reference to how the 'upper end housing numbers' could be mitigated by timescales for delivery and broad area (some 14 authorities) where the additional growth requirement is likely to be spread. This pressure will add to the existing demographic and economic pressures which significantly exceed current planned provision across the region. It is unclear whether such growth can be reliably planned and delivered within the necessary timeframe. It is likely that such additional growth requirements could not be met without building in areas such as the Green Belt and areas at risk of flooding.
34. The Council acknowledges that there is a zone of influence to affect the demand that Heathrow will serve affected by travel distance, the following table details the districts located within 60 minutes of Heathrow for non-London boroughs (please note that there is no particular ordering to the list). This zone of influence is then likely to be reflected in areas where additional housing provision to serve an expanded Heathrow maybe demanded from by employees

<u>NON-LONDON BOROUGHs</u>
Aylesbury Vale
Bracknell Forest
Chiltern
Elmbridge
Reading
Runnymede
Slough
South Bucks
Spelthorne
Three Rivers
West Berkshire
Windsor and Maidenhead
Woking
Wokingham
Wycombe

Source: Transport connectivity and accessibility of key services statistics - DfT, 2013⁸

35. Whilst the detail provided within the consultation material is of concern to the Council, it is in fact the combination of this alongside the anticipated growth necessary to support the population projections for the district which is of great concern. As the in combination effects are likely to only exacerbate the identified land take shortfalls in the district.

⁸ <https://www.gov.uk/government/collections/transport-connectivity-and-accessibility-of-key-services-statistics>

36. The Preferred Options, Borough Local Plan for the Royal Borough of Windsor and Maidenhead identified that an additional 7,415 dwellings could be delivered between April 2011 and March 2030 in ways which maintain environmental quality and where development should not be restricted as advised by the NPPF. This figure is estimated to be made up of the following:

Housing supply from areas where development is not restricted 2011/12 to 2029/30	
Source of supply	Number of dwellings (net)
Housing completions	370
Housing commitments at March 2013	1,866
Housing allocations in the Maidenhead Town Centre Area Action	733
Housing allocations proposed in Policy HOU2 of the Borough Local Plan	2,237
Housing provision from other identified sites	431
Housing provision from small sites(49)	1,778
Total	7,415

Source: Table 2 of Borough Local Plan for the Royal Borough of Windsor and Maidenhead, January 2014

37. The Borough Local Plan for the Royal Borough of Windsor and Maidenhead stated that *“from Census data we know that in the period 2001 to 2011 the population of the borough increased by 11,000 people or 4,000 households, and that the number of people aged 16-74 in employment increased by 5,500 people. Demographic and economic projections suggest that this growth will continue with potential for around 12,000 additional households being formed by 2029 should trends continue.”*
38. This highlights that the Authority is unlikely to be able to meet the projected demographic need for housing, without additional pressures for housing within the wider Heathrow area created by these proposals.
39. The Council notes that the NPPF includes relevant references to viability and deliverability through para 174, NPPF which states that *“local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence”*.

40. As stated within the NPPF “*public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the **strategic priorities** set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities*” (para. 178). Due to the considerable change in policy stance by Government and aim to provide more localism rather than imposed decisions and the loss of regional planning places greater emphasis upon the success and soundness of plans and strategies that proposals are to be based upon.
41. The supporting consultation material states that consideration has been given to the extent to which the need for additional housing prompted by the airport expansion can be accommodated or not. Such matters will be considerably affected by the use of population forecasts and the trends that these anticipate. It has been clear that the last few models released by ONS have considerably varying projections which considerably impact upon the anticipated outcomes documented as part of this consultation.
42. The Thames Basin Heaths Special Protection Area applies severe restrictions on house building within 5km of the designated land areas. This affects the following Parish Councils in the Borough: Sunninghill and Ascot, Sunningdale and part of Old Windsor. This 5km buffer zone around the SPA reduces the available land within the Borough for any associated expansion as a result of the proposals at Heathrow and as such, displaces the associated land takes to other areas which are already constrained within the Borough.
43. The Council would like to understand the methodology and projections in greater detail. Consideration should also be given to the relevant existing policies within the adopted Royal Borough of Windsor and Maidenhead Local Plan (incorporating alterations adopted June 2003) and the Borough Local Plan (Preferred Options, January 2014), as housing density will considerably affect the volume of housing which could be provided in certain locations.

How the impacts of airport development will affect local plans and priorities

44. The Council is concerned that such proposals could result in considerable housing and/or land pressures within the borough.
45. The supporting consultation material states that the total additional households associated with the two Heathrow proposals could amount to up to 200 to 500 additional new housing units per local authority per year in the Heathrow area. The report recognises that there may be some localised constraints but states that there should be sufficient flexibility within the area as a whole given the relative scale of the changes. As already outlined, the extensive constraints of Green Belt and flood risk means there is no such flexibility within the Royal Borough of Windsor and Maidenhead.

46. It is also acknowledged within the consultation material that additional housing would also require additional social infrastructure such as schools, hospitals and leisure centres. The high end estimate would require to be supported by:
- A maximum of 50 primary schools (across all 14 local authorities)
 - 6 secondary schools
 - 28 additional health centres and primary care centres
47. It is unclear what provisions the Airports Commission foresee as required to support such housing provision and whether such figures are per local authority or across the anticipated 14 local authority areas. The supporting consultation materials suggests that the *“14 local authority areas around Heathrow could be well placed to take advantage of any new jobs or business opportunities due to demographics, skill mix, relatively high business density and commuting behaviour.”*
48. As such proposals for expansion at either Heathrow or Gatwick are at such early stages within the development and plan making processes it is unclear how they may progress into the future, so the Council believe that it would be pre-emptive for the Borough Local Plan to account for any potential growth areas within the district. At this time, the Council acknowledges that the plan should maintain the special qualities of the Borough’s environment and places through the existing environmental designations i.e. Green Belt.
49. If such proposals of Heathrow expansion were confirmed by the Airport Commission, it could clearly have a direct impact upon the delivery and timescales of the emerging Borough Local Plan, site allocations and strategy.

Character of place / Mitigation measures

50. It is recognised that the supporting consultation material states that the Extended Northern Runway would have a *“significant adverse effect on the Windsor and Maidenhead Settled Developed Floodplain character area and the Hillingdon Historic Core character area due to physical changes resulting from airport infrastructure and a reduction in visual amenity.”*
51. Potential identified land takes with the Royal Borough of Windsor and Maidenhead are set out below showing the anticipated land take (in Hectares) by land use classification for the Extended Northern Runway. This is recorded as part of the consultation as this runway proposal actually extends into the Royal Borough of Windsor and Maidenhead’s boundary.

Land Use	Breakdown of Land Take within the RBWM (ha)⁹
Agricultural land Fisheries	26.7 ha (up to 46.9 ha)
Forestry	0.8 ha (up to 4.8 ha)
Minerals	1.1 ha
Recreation and leisure (incl. open space)	0
Transport	0 (up to 4.4 ha)
Utilities and infrastructure	0
Residential	3.3 ha
Community services	0
Retail	N/A
Industry and business	0
Unused land	6.9 ha (up to 10.3 ha)

52. The supporting consultation material states that the land take within Green Belt as a result of the airport expansion is anticipated to be 34.2Ha and potentially 20.9Ha for land affected by surface access works for the Extended Northern Runway. These detail the land uses potentially affected by the land take associated with the runway proposal only, and not any of the anticipated additional growth as a result of the proposal.

53. There is no similar data affecting the Royal Borough of Windsor and Maidenhead for the North West Runway.

Landscape, Townscape and Visual Impact Assessment

54. The Council notes that the supporting consultation material makes reference to the Royal Borough of Windsor and Maidenhead, (2004). Landscape Character Assessment¹⁰ which should also be considered. Consideration should also be given to the Townscape Assessments for Maidenhead and Cookham, Windsor and Ascot (2010)¹¹ and the Royal Borough of Windsor and Maidenhead Conservation Area Appraisals¹².

⁹ Heathrow Hub interchange has been excluded from the footprint and the assessment.

The area of land take for the airport expansion within each authority is identified in bold. The figure in brackets, if applicable is the maximum potential affect allowing for additional land take for surface access.

¹⁰ http://www.rbwm.gov.uk/web/pp_landscape_character_assessment.htm

¹¹ http://www.rbwm.gov.uk/web/pp_townscape_assessment.htm

¹² http://www.rbwm.gov.uk/web/pp_conservation_area_appraisals.htm

55. Heathrow North West Runway

The supporting consultation material then summaries the anticipated impacts upon landscape as a result of the proposals, which are summarised as:

“There are likely to be views from the Queen Mother Reservoir, but due to its distance from the proposed scheme, and the context of the existing airport, effects would not be significant. Effects during construction and operation for these areas would therefore be negligible.”

The Council are concerned over how this conclusion has been reached based upon the limited information of land takes and proposals and assessments undertaken.

56. Heathrow Extended Northern Runway

The supporting consultation material then summaries the anticipated impacts upon landscape as a result of the proposals, which are summarised below:

“The Windsor and Maidenhead Settled Development Floodplain character area is made up of a fragmented landscape with some areas of farmland and a diverse range of vegetation types, and is of good quality. Much of the character area would remain intact apart from the north eastern corner, which would be directly affected in order to accommodate the end of the new runway. It is likely that there would be views towards construction works from a large part of the remaining character area. ... For these reasons there would be a moderate adverse magnitude of impact and a moderate adverse effect during construction. The areas of land taken for the runway would be lost permanently. However, the completion of construction would help to improve visual amenity for other parts of the character area. In addition, screening vegetation and habitat improvements are also proposed, which would help to improve the character and visual amenity of the area.”

57. The Council are concerned over how this conclusion has been reached based upon the limited information of land takes and proposals and assessments undertaken. The extent of proposed mitigation does not appear to be sufficient to overcome the level of anticipated impact from the proposal.

Heritage Assets

58. The Council assumes that the Airports Commission will seek further views of English Heritage and the local views of the Archaeological Officers within the Royal Borough of Windsor and Maidenhead, as the proposals become more specific in terms of identified land take and those impacts upon acknowledged heritage assets.
59. The significance and importance of the historic environment is detailed within the NPPF section 12, conserving and enhancing the historic environment. For example the NPPF states that *“when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be.”*

60. It is important to note the Borough contains many sites of national heritage importance, upon which either Heathrow expansion will have a significant impact upon:

Statement from Eton College

- a) *Eton College is a boarding school, founded in 1440, located five and a half miles due west of the proposed third runway. Eton College is profoundly concerned about the impact that any expansion at Heathrow will have on the school.*
- b) *The College is already directly over-flown by some aircraft departing westerly using high power and creating a noisy disturbance of lessons, concerts and outdoor conversation when planes fly directly overhead*
- c) *As we understand it, the predictions deduced from the proposers' document indicate that the impacts on the local Eton community will be roughly a 6dB increase in noise attributed to the Heathrow Hub Proposal and as much as a 3dB increase in relation to the HAL scheme.*
- d) *Even without detailed modelling for Eton specifically, it is evident that Eton can expect a significant increase in noise with either proposal, our understanding is that noise will double if the north-west runway goes ahead and that the position will be even worse should the northern extension be chosen.*
- e) *In addition to noise, road traffic is another key consideration for Eton, with the surrounding road network being put under increased pressure from passenger and employee traffic. The amount of traffic through Eton College, with the Slough road running through the middle of our site, is already a concern on child safety and pollution grounds. The roads through the College are used as a "rat run" alternative to the M4 and A4 in the Slough area. Additional passengers and workers at Heathrow are bound to exacerbate the problem*

61. As the commission will be aware, the Borough is also the location of Her Majesty's main residence, Windsor Castle and its surrounding Royal Park. Both Eton and particularly the castle are not only strategically important for the staging of State events, but are also key national tourist attractions; brining nearly 7 million tourists per year to the Borough. To subject these visitors to over a doubling of noise is unacceptable and could have a significant effect on both the numbers of visitors and the length of time spent within the town; creating a significant economic impact.

Waste Management and generation

62. The Council notes that the Airports Commission has assessed the proposals anticipated operational waste projection forecasts for Heathrow. The Council is concerned that the supporting information does not aim to estimate the generation of construction and demolition wastes during the construction phase of the proposals, which is anticipated to be substantial in terms of both waste generated from the site and demands to aid construction phases.
63. Any increase in passenger numbers at Heathrow is anticipated to result in an increase in waste generation per year at Heathrow, the Council welcomes the inclusion of an assessment of such potential as in the maximum region of 50,000 tonnes at 2050, in comparison to 25,000 tonnes in 2010.
64. The Council notes that there appears to be no information provided to quantify waste generation for the Extended Northern Runway proposal, this is disappointing. It is of concern that such information for Heathrow is lacking when compared to that provided for the Gatwick Airport Second Runway proposal which actually considers an on-site waste management facility. Such a proposal for on-site provision should be supported, as it will minimise HGV movements of waste, allow for the waste to be managed at source and could allow for Combined Heat and Power to be utilised (if at all possible).
65. The Council is concerned that there is a lack of reference to the National Planning Policy for Waste and supporting National Planning Practice Guidance for waste throughout the supporting consultation documentation as well as the Waste Local Plan for Berkshire (December 1998).
66. *Re-provision of Energy from Waste facility: Impacts on existing land uses by the North West proposal*

The Council has concerns over the direct impacts that the proposals will have upon the existing, operational land uses which would be lost by this proposed development, especially that of the energy from waste plant at Colnbrook. These waste recovery plants are notoriously difficult to locate proximate to the source of waste and account for other key planning considerations, to ensure that any potential impacts are adequately mitigated against.

67. The supporting consultation documentation states that Heathrow Airport Ltd proposes the re-provision of the existing Lakeside *Energy from Waste* facility to an adjacent site. Such proposals are likely to have significant demands upon existing waste management infrastructure and are likely to result in the requirement for additional sites to manage an overall increase in municipal solid waste, commercial and industrial waste and construction, demolition and excavation waste arisings if all anticipated land use developments are delivered to support the Heathrow proposals i.e. the additional housing and commercial land linked to the proposal will increase demand for such infrastructure also.

68. Whilst the documentation states that re-provision will be made the Council is concerned over the lack of detail provided regarding tonnage of facility, facility technology and design, land take requirements, alternative site options, proximity to source of waste, lack of timescales for loss of existing waste management capacity, Capacity gap and anticipated re-provision planning and construction phase timetables, etc. Such a proposal in itself is likely to be considerably complex to ensure appropriate implementation. Further detail is therefore required before the Council could assess any impacts from this proposal on the Royal Borough of Windsor and Maidenhead.

Minerals

69. Any proposed development will generally have a resultant demand upon mineral resource provision to support the proposals, this may well be in terms of both primary (sand and gravel and crushed rock) and secondary and recycled aggregates. It is unclear that such demands can be met by the existing sites within the local authority (potentially due to number of sites, condition restrictions or quality of mineral) and whether transportation of mineral over a greater distance is viable or realistic. Such provision could have significant implications to the highway network, environment and local amenity.
70. When plan making consideration should be given to how *“planning applications will be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust, visual intrusion, traffic, tip- and quarry-slope stability, differential settlement of quarry backfill, mining subsidence, increased flood risk, impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality”* (para. 143, NPPF).

Further detail is required before the Council could assess any impacts from this proposal on the Royal Borough of Windsor and Maidenhead.

71. The Council is concerned that there is a lack of reference to the National Planning Policy Framework and supporting National Planning Practice Guidance for minerals provision within the supporting consultation documentation as well as the saved policies from Replacement Minerals Local Plan for Berkshire (RMLP) (incorporating alterations adopted in December 1997 and May 2001).

RBWM Comments - Quality of Life

Heathrow proposals

1. The Council acknowledges that the supporting consultation material utilises a 5km Quality of Life analysis model which in conclusion makes references to the 'bundled impact' of the proposals. It is acknowledged that such an assessment of the proposals is subjective and wellbeing is a relatively difficult matter to monitor.
2. The conclusion which the supporting documentation comes to is based upon a 'bundled impact' which concluded that any impacts were broadly identified to be neutral, although the airport noise is summarised as having negative impacts due to daytime aircraft noise on wellbeing, happiness and feeling relaxed, airport proximity is not assessed to have any influence on wellbeing, although negatively impacts of feeling relaxed.
3. Although the report states than any such results should be interpreted with some caution. The Council believes that such results are based upon a balancing of the more significant local impacts against areas which are deemed to result in wider significant gains. The Royal Borough of Windsor and Maidenhead believe there is likely to be significant impacts in land use pressures and loss of environmental resources and designations due to the deemed overall benefits for the wider region and country.
4. The supporting consultation material states that the neutral outcome is due in part to the positive aspects of living near to airports (e.g. improved transport infrastructure, access to jobs and cheaper property) are offset by the negative effects (e.g. noise, pollution and negative impact upon visual amenity). These impacts upon wellbeing have been considered against each of the individual appraisal framework modules i.e. strategic fit, place, surface access, etc. although a number of the summaries state that the potential impacts need to be confirmed.
5. It is unclear to the authority if the impacts if the supporting information provides a lack of clarity over the anticipated impacts from the proposal. The Council believes that these are likely to be significant due to the proximity of the proposal to the administrative area of the authority, as this is seen by the Royal Borough of Windsor and Maidenhead to have significant local impacts environmentally, whereas we believe that the positive improvements in quality of life are tangibly going to be seen nationally.
6. In summary, the Borough does not therefore concur with the Commission's viewpoint that the main impacts for areas within the Royal Borough and those within 5km of the airport are from noise alone (2.73 – HAL considerations) and that such impact on quality of life can be balanced by factors such increased 'local employment' to form a broadly "neutral impact". To form such a view point demonstrates a lack of understanding of local pressures. The Borough invites the commission to discuss these factors with the authority in order to develop a clearer understanding of the impacts in question..

RBWM Comments – Community

1. The proposals at Heathrow could result in loss of existing facilities within the local area, due to impacts of the proposals on existing land takes. Such major redevelopment could result in a lack of community cohesion and a further fragmented housing and land use layout in that locality. The Council notes that such issues may already be the case through the existing interchange of the M25 and M4 alongside the Great Western Mainline railway and Heathrow site. These can become considerable issues which can limit the effectiveness of sustainable travel methods, fear of crime and sense of place through legibility, character and adaptability, quality of public realm and ease of movement. The layout, scale, landscape, landmarks, density, massing and materials are relevant aspects of the proposed development necessary to understand the type and quality of the potential replacement residential properties.
2. The Council notes that numerous references within the consultation material is made to the consideration of local concerns, specifically in relation to noise, environmental and housing growth matters. It is assumed that the Airports Commission will understand the extent and strength of concern of these matters through the volume of responses received as part of this consultation process, although the Council is unclear on the proposed process and future timetable for further consultation events as these proposals develop and how comments made are going to influence the refinement and selection process of the proposals.

Your views on specific areas of the Commission's appraisal

Q6 Do you have any comments on the Commission's sustainability assessments, including methodology and results?

<https://www.gov.uk/government/consultations/increasing-the-uks-long-term-aviation-capacity>

If you have any comments, please provide them below. If you have no comments, please go to the next question.

No comment made.

Which of the shortlisted runway options, if any, do your comment(s) relate to? (Tick all that apply.)

☐ **Gatwick Second Runway**

☐ **Heathrow North West Runway**

☐ **Heathrow Extended Northern Runway**

Your views on specific areas of the Commission's appraisal

Q7 Do you have any comments on the Commission's business cases, including methodology and results?

<https://www.gov.uk/government/consultations/increasing-the-uks-long-term-aviation-capacity>

If you have any comments, please provide them below. If you have no comments, please go to the next question.

No comment made.

Which of the shortlisted runway options, if any, do your comment(s) relate to? (Tick all that apply.)

☐ Gatwick Second Runway

☐ Heathrow North West Runway

☐ Heathrow Extended Northern Runway

Any further comments


Q8 Do you have any other comments?

If you have any comments, please provide them below. If you have no comments, please go to the next question.

Resident Polling

1. There have been a number of polls conducted by Heathrow Airport directly and via the airport sponsored 'Back Heathrow' community group. The latest of these airport polls (HAL – January 2015) purporting to show a 43% net support and 40% net opposition in the Windsor area.
2. The Commission should note that the Borough believes the manner in which this poll was undertaken to contain elements of bias – particularly in relation to the phrasing of questions.
3. The Royal Borough has undertaken work to establish an independent analysis of Borough resident viewpoints with regard to airport expansion. To establish these viewpoints, IPSOS MORI (IM) were commissioned to establish five key questions to be put to a random telephone sample of over 1000 residents, as follows:
 - a) *To what extent do you support or oppose the option for a new runway to the North West of Heathrow Airport?*
 - b) *To what extent do you support or oppose the option for a new runway at Heathrow Airport by extending the existing northern runway to the west?*
 - c) *To what extent do you support or oppose the building of a new runway at Gatwick Airport?*
 - d) *In your opinion, should the number of flights at Heathrow Airport be increased, reduced, or remain the same as they are currently?*
 - e) *In your opinion, should the number of night flights at Heathrow Airport (between 23:30 and 06:30) be increased, reduced or remain the same as they are currently?*
4. IM ensured that these questions & results obtained were captured from a representative sample across a complete range of demographics and was also representative of areas both overflowed, not overflowed and those having recent experience of flight trials.
5. The results obtained demonstrate a net opposition (-8%) for both Heathrow developments and a net support (+35%) for the Gatwick proposal across all Borough electorate wards. Furthermore, 57-58% of residents indicated that they believed the number of flights (including night flights) should remain the same out of Heathrow. These results clearly support the Borough's position that Heathrow is a necessary neighbour & that residents believe the airport can be better, without expanding.

2015 Resident Poll Results

 THE ROYAL BOROUGH OF WINDSOR AND MAIDENHEAD		Total
Base size: all respondents		1014
Q1.	To what extent do you support or oppose the option for a new runway to the North West of Heathrow airport?	
	Strongly support	14%
	Tend to support	17%
	No feelings either way	27%
	Tend to oppose	12%
	Strongly oppose	26%
	Don't know	4%
	Support	31%
	Oppose	38%
	Net support	-8%
Q2.	To what extent do you support or oppose the option to provide a new runway at Heathrow Airport by extending the existing northern runway to the west?	
	Strongly support	13%
	Tend to support	17%
	No feelings either way	26%
	Tend to oppose	11%
	Strongly oppose	28%
	Don't know	5%
	Support	30%
	Oppose	38%
	Net support	-8%
Q3.	And to what extent do you support or oppose the building of a new runway at Gatwick Airport?	
	Strongly support	27%
	Tend to support	23%
	No feelings either way	32%
	Tend to oppose	7%
	Strongly oppose	8%
	Don't know	3%
	Support	50%
	Oppose	14%
	Net support	35%
Q4.	In your opinion, should the number of flights at Heathrow Airport be increased, reduced, or remain the same as they are currently?	
	The number of flights should be increased	21%
	The number of flights should remain as they are	58%
	The number of flights should be reduced	13%
	Don't know	8%

Q5. And in your opinion, should the number of night flights at Heathrow Airport be increased, reduced, or remain the same as they are currently? By night flights, I mean flights between the hours of 11.30pm and 6.30am.

The number of night flights should be increased	10%
The number of night flights should remain as they are	57%
The number of night flights should be reduced	28%
Don't know	5%