

Communities &  
Built Environment

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Date: 3<sup>rd</sup> February 2015

Dear Sir/ Madam,

**Re: Increasing the UK's long-term aviation capacity – consultation**

Buckinghamshire County Council welcomes the opportunity to respond to this consultation and recognises the potential economic benefits that the expansion of Heathrow could bring to Buckinghamshire and the wider South East. There are however a host of negative implications posed by the proposal which would affect parts of southern Buckinghamshire and would be of detriment to this area and the County as a whole. The proposals concerning surface access provision and requirements are particularly sensitive and require detailed further assessment and consultation with relevant communities and local authorities. Technical comments regarding this and other matters around economic, environmental, community and delivery concerns form the second part of this response and must be given due and timely consideration. While the County Council is broadly supportive of expansion at Heathrow Airport, we raise concern around a number of highlighted appraisal areas and would wish to engage in early and focused discussion with all stakeholders as work progresses.

The technical response by Buckinghamshire County Council (BCC) to this consultation can be found below and is organised by the appraisal framework categories. We clearly define where comments are specific to a certain scheme where relevant. Our response is largely in reference to the consultation questions 1 and 2.

***Surface access - Heathrow Airport extended northern runway and Heathrow Airport new north-west runway***

As the implications for surface access for the two Heathrow options are similar, our response does not differentiate between the two options to draw further conclusions

on acceptability or otherwise. As within the consultation documentation, the Heathrow hub station component is dealt with separately below.

### *Rail assessment*

BCC agrees with the analysis that western rail access would provide a significant amount of rail capacity and connectivity to Heathrow. BCC agrees with the analysis that western rail access opens up journey opportunities for Airport passengers and employees from the West of Heathrow that are currently not possible. Crossrail will provide a superior service to Heathrow than Heathrow Connect.

BCC continues to oppose the proposal for High Speed 2 and any associated proposals for a spur to Heathrow. In their assessment, we note that Jacobs have set out the present distribution of Heathrow passengers, such as that 93% of Heathrow's passengers travel to and from regions of the UK that would not be served by HS2. We are pleased to note that the submissions of both schemes make it clear that they are not dependent on HS2 serving the airport. BCC do not believe that the government has produced sufficient quantitative evidence to support to support the claim that there is a case for a link to Heathrow.

### *Road assessment*

The assumption seems to be that impact on the local network within Buckinghamshire will be reasonably small during operation. We note this with caution and strongly urge that a full Transport Assessment is undertaken and suitable mitigation discussed with BCC as the highways authority. We emphasise the vitality of full and transparent technical information in order to support decisions throughout planning and delivery process.

However the impact during construction of the required highway schemes – such as on the A4 and M25 - could have a very significant impact on the local highway network and this does not appear to have been considered. This relates to the construction traffic itself, and the possibility of people using local roads to avoid delays on the Strategic Road Network. This concern must be addressed and assessed fully in a Transport Assessment and Construction Management Plan, including proposals for mitigation should they be demonstrated to be necessary.

### **Surface access – Heathrow hub station**

The proposal for a transport hub at Iver is considered as a separate element as part of the Airports Commission consultation but is similarly linked to both expansion options. The function of the hub will be to transfer passengers to the airport site by dedicated rail line and would be supported by a 10,000 space car park (plus hotel facilities etc) with connections to the M25. The proposed site lies on the Thorney golf course and the Thames Water waste water plant (should the hub proposal progress, a smaller plant is expected to be relocated around the Court Lane area).

If the hub proposal were to progress it would likely force the closure of the existing station at Iver, given its proximity to the new site. The hub proposals greatly exceed any development envisaged for the South Bucks area and would significantly

exacerbate local congestion. More detailed observations regarding road and rail matters now follow.

### *Rail assessment*

BCC is in general agreement with the Jacobs analysis of the Heathrow Airport Hub Option. It leads to the conclusions that the Hub would not be beneficial for Buckinghamshire, in particular the residents in and around Iver. Examples of negative impacts include:

Impact of construction: Increase in construction traffic, increase in traffic due to workers commuting, noise of construction, visual impact (e.g. possibility of lighting of the compound at night), environmental (e.g. construction dust and temporary stockpiling of materials) and stoppages on the line.

Reduction of Rail services to Iver: The Jacobs analysis calls into question the Heathrow Hub assumption that the Crossrail service pattern at Iver would be maintained due to the close proximity of the Hub to Iver. Iver is currently served by 4 departures to London Paddington in the peak hours. The addition of the Heathrow Hub - along with the associated infrastructure and timetable proposals - may influence Iver stopping patterns which simply cannot be assumed to remain at current levels. Indeed, in order to reduce the negative impact the inevitable lengthening of the journeys of those existing users of the GWML route because of the introduction of a new station, it may seem justified to exchange the stops at Iver for the stops at the Heathrow Hub. These complex scenarios need to be fully assessed.

The Western Rail Access to Heathrow (WRAtH) scheme would be scrapped as it would be unnecessary, however WRAtH delivers many of the same benefits of the Heathrow Hub scheme (such as rail accessibility to Heathrow from the Great Western market sector), but without many of the negative impacts (please see above) and at significantly lower cost.

The rail assessment provided demonstrates the significant negative impacts on the local area; environmentally, to the local transport networks, (such as to the current local rail provision and the local road network) to the landscape, and the sense of character of Iver.

### *Road assessment (including car parking)*

As with the on-site surface access discussed above, there appears to be no assessment of the impacts of the construction or operation of the hub on the local road network. We would be unable to accept the concept of an off-site transport hub, especially located in Buckinghamshire, without understanding these impacts and agreeing suitable mitigation, as required. Further, there should be no assumption that BCC would fund the required infrastructure, which may be contrary to adopted policy. We are unclear whether an off-site hub would be classified as a NSIP, as part of any wider expansion at Heathrow, or whether it would feed through the Local Plan process. Either way, funding arrangements for supporting infrastructure are very important and should be clarified and discussed with the local planning authorities as early as possible.

The provision of a 10,000 space car park would have negative impacts on the local environment, landscape, quality of life and local transport network. As the Commission's analysis observes, the Hub would further disperse airport land use and the impacts of the land use over a wider area, and into Buckinghamshire. The footprint of the proposed Hub not only encroaches onto Green Belt land but also far exceeds any development on that site envisioned by the South Bucks Local Plan.

We agree with Jacobs that it is not clear how the car parking demand – 10,000 spaces - at the hub was calculated. For example, what assumptions have been made about the car park pricing in comparison to on-site parking at the airport? This could significantly increase or decrease demand at the hub, and therefore influence the average number of vehicles per hour arriving at the hub car park.

Heathrow Hub state that a number of benefits outweigh the negative costs – in particular significant benefits are quoted related to the decongestion of the road network as a result of the parking provision at the hub. We have a few points to make here. Firstly, with the hub supposed to be located in Buckinghamshire, any supposed benefits to the road network at the airport could be undermined negative impacts on the in the local highway network in the vicinity of the hub. Secondly, it is unclear if this would be balanced or outweighed by mode shift to car due to the time penalty for existing rail passengers

Assertions are made that the hub would be supplemented by commercial and hotel land uses. There is no evidence of the impact on the local transport network (5.4.8). We could not accept this principle without a Transport Assessment.

It is not obvious that the benefits (especially in relation to the 10,000 space car park and claimed decongestion benefits) outweigh the dis-benefits in terms of construction impact, impact on the local highway network of the hub and associated commercial development, or the impact on existing rail users at Iver. If the intention is to genuinely attract rail use, we would encourage that consideration is given to the provision of a rail - and possibly coach - hub. We would like to assess if this would greater use of rail from the Great Western sector.

### **Community and local economy impacts – *Heathrow Airport extended northern runway***

The option to extend the northern runway at Heathrow airport is estimated to cost £13.5 billion. While the option is geographically furthest from the County boundary, the option will require a substantial land-take of 724 hectares; not including potential further take for surface access (330ha) and flood storage (60ha). Should this option progress the consultation document states at least 242 dwellings and commercial units will be demolished to the west of the current northern runway and will likely be focused on the Poyle Industrial Estate. Some loss is also expected north and south of this area and all properties will clearly need to be relocated outside of the proposal site. Given the proximity of this outline area to the Buckinghamshire boundary and the land take proposed as part of this option, we note the intended land take and relocation of displaced properties with caution.

We also note the expectation that this option would create the need for an additional 60,600 homes, to be spread across the fourteen local authority areas closest to the

airport and would include the South Bucks District within the County boundary. It is likely that many of the local authorities included in this area would struggle to accommodate this additional housing need, giving consideration to major developments already permitted in the context of areas with significant local environmental constraints. The implementation of this option alone could result in a loss of 238 hectares of designated Green belt land, posing potentially significant implications for Buckinghamshire with regards to the loss of high quality and extremely valued land either within or close to our County boundary. Pressure on the green belt is further exacerbated by the local area becoming more attractive as an investment location in line with the increased connectivity of the UK.

While the economic impacts of the proposal could be favourable to the Buckinghamshire (and particularly South Bucks) economy, this expectation of designated land must be taken into account when considering the future of this option. We would welcome extensive further details regarding the above and would wish to enter into discussion with all involved should this option progress.

The documentation notes that as well as the immediate community around the airport, surrounding areas of West and South West London, Berkshire, Buckinghamshire, Surrey and Oxfordshire will also be impacted in terms of noise, air quality, and quality of life. We refer to these in other sections of our response.

### **Community and local economy impacts – *Heathrow Airport north-west runway***

The option to construct an additional full length runway to the north west of the current northern runway at Heathrow airport with a new terminal to the west of the current terminal hub is estimated to cost £18.5 billion. Geographically, the proposal site lies closer to the County boundary, closely following the alignment of the A4 road and will require a substantial land-take of 569 hectares; not including potential further take for surface access (294ha) and flood storage (43ha). Should this option progress the consultation document states at least 783 dwellings and commercial units will be demolished in the area surrounding the current airport site. These properties will need to be relocated outside of the proposal area and will include major headquarter offices and an energy from waste plant. Given the proximity of this outline area to the Buckinghamshire boundary and the land take proposed as part of this option, we note the intended land take and relocation of displaced properties with caution.

We also note the expectation that this option could create the need for an additional 70,800 homes, to be spread across the fourteen local authority areas closest to the airport, which would include the South Bucks District within the County boundary. It is likely that many of the local authorities included in this area would struggle to accommodate this additional housing need, giving consideration to major developments already permitted in the context of areas with significant local environmental constraints. The implementation of this option alone could result in a loss of 431 hectares of designated Green belt land, posing potentially significant implications for Buckinghamshire with regards to the loss of high quality and extremely valued land either within or close to our County boundary. Pressure on the green belt is further exacerbated by the local area becoming more attractive as an investment location in line with the increased connectivity of the UK.

While the economic impacts of the proposal could be favourable to the Buckinghamshire (and particularly South Bucks) economy, this expectation of designated land must be taken into account when considering the future of this option. We would welcome extensive further details regarding the above and would wish to enter into discussion with all involved should this option progress.

The Colnbrook with Poyle ward of Slough, situated to the west of the airport and to the south of Buckinghamshire, would be affected by the provision of a new access road from the diverted A4. More detailed traffic impact assessments are required to identify the impact this will have on the nearby Buckinghamshire road network, particularly southern Buckinghamshire which has existing HGV issues. There is potential increased local congestion from the A4 works and works to put the M25 in a tunnel. This is discussed in comments on the road assessments above.

It is stated that part of the Colne Valley Regional Park will be lost and that as mitigation HAL proposes to relocate this part elsewhere in the Park. The AC believes this will provide 'full' mitigation. There is no detail where this relocation will be. This needs to be accessible to communities who currently use the area which is to be lost. Colne Valley Park CIC must be included in discussions, as well as all local authorities which encompass part of the park. We would caution that this is a complex and sensitive area in terms of the number of stakeholders and other development pressures from the proposed HS2 line which goes through the park.

The documentation notes that as well as the immediate community around the airport, surrounding areas of West and South West London, Berkshire, Buckinghamshire, Surrey and Oxfordshire will also be impacted in terms of noise, air quality, and quality of life. We refer to these in other sections of our response.

BCC would like to draw attention to the following report which assessed the economic implications of Heathrow on local authorities within the 'western wedge' ([http://www.buckstvlcp.co.uk/uploads/downloads/Heathrow Economic Impact Assessment - Regeneris - Final Report 24 Sep.pdf](http://www.buckstvlcp.co.uk/uploads/downloads/Heathrow_Economic_Impact_Assessment_-_Regeneris_-_Final_Report_24_Sep.pdf)) .

## **Delivery – risks and mitigation**

The documentation recognises that European rules on air quality may present a risk as a number of areas around Heathrow are in breach of European rules regarding air quality. It is stated that this is due largely to background traffic on the M25 and M4, as opposed to airport operations. Buckinghamshire County Council is concerned with the associated risk that the anticipated shift towards sustainable modes of transport does not occur to the extent expected. There must be very clear mitigation actions if this risk is realised and a thorough analysis of the probability of this risk.

The documentation discusses the risk that securing planning permission may be a lengthy process. One of the means of securing planning permission for a strategic infrastructure project such as this is through a Hybrid Bill. Buckinghamshire County Council would like to emphasise that the Hybrid Bill process is uncommon and specialist in nature. It is complex for the public and stakeholders to engage with the process. We would encourage that local authorities surrounding the airport are consulted on regarding how planning permission is sought, if the Government confirms its support for the proposal.

The replacement of Lakeside Energy from Waste Plant is identified as a risk as the planning and construction of an EfW plant is a substantial exercise. We strongly urge that as an adjacent Minerals and Waste Planning Authority BCC has full and early engagement on any proposals in this area.

## **Flood risk**

BCC believe that the analysis completed by of the flood risk assessment is comprehensive and our comments below mainly reiterate those already highlighted in the Flood Risk Assessment. As with most of this consultation response, the comments below do not relate to the Gatwick Airport second runway as this development is outside of the catchments our flood team covers.

We are pleased to see that there are considerations of upstream flood storage compensation; this would be welcomed in Buckinghamshire as they could benefit areas to the south of the county. If these flood storage areas fall within Buckinghamshire we would be keen to have early involvement in these plans.

We suggest that the proposed residential expansion in the South East be considered and accounted for, as this will have a knock on effect to the area of impermeable surfaces and therefore surface water runoff.

Some of the options proposed include extensive culverting in some areas; we would discourage this as it is not a sustainable solution.

We note that no groundwater modelling has been undertaken, we would recommend that this be included to help steer predictions of where displaced groundwater may go and to mitigate this. It has also been noted that surface water has not been fully accounted for and therefore we would expect further investigation on this.

SuDS should be utilised throughout the developments, for new infrastructure as well as existing to ensure betterment of surface water discharge and to contribute towards water quantity. It has been proposed that green roofs & walls, and rainwater harvesting will be included in the design; we would suggest that these be incorporated as widely as possible, including throughout the existing infrastructure. We would also encourage the installation of permeable paving solutions where safe and practical to do so.

## **Quality of life and Place**

For impacts on areas beyond the immediate community of the airport, the community assessment report directs readers to the Quality of life (QoL) assessment. Therefore it is very disappointing that the QoL assessment does not deal specifically with the 3 expansion schemes, but instead deals with quality of life in a generalised way. QoL has therefore been undervalued, making it impossible to compare any benefits and disbenefits accurately. We believe that it is incomplete and does not recognise the highly sensitive nature of airport expansion in south-east.

BCC would like to take the opportunity under this category to reinforce that we believe that Public Health should be dealt with separately, and not just under other headings such as noise and air quality. This is a view that we have submitted to previous Airports Commission consultations through the Strategic Aviation Special

Interest Group. Public Health is now the responsibility of local authorities and therefore we would expect to be consulted on these points specifically and fully.

## **Ecology and biodiversity**

Overall the assessment appears to give a good coverage of the biodiversity issues.

### *Colne Valley*

The Heathrow extension has the potential to impinge upon the Colne Valley Park (immediately west) and, by extension, the Colne Valley Biodiversity Opportunity Area (BOA) within Buckinghamshire. BOAs are the most important areas for biodiversity in the county. The Buckinghamshire and Milton Keynes Natural Environment Partnership (our LNP) is developing a vision for delivering Buckinghamshire's Biodiversity Action Plan (BAP) through a focus on BOAs. BOAs represent a targeted landscape-scale approach to conserving biodiversity and the basis for an ecological network. For more information see: [http://www.buckinghamshirepartnership.co.uk/partnership/bmkbp/biodiversity\\_opportunity\\_areas.page](http://www.buckinghamshirepartnership.co.uk/partnership/bmkbp/biodiversity_opportunity_areas.page)

BOAs are recognised in local policy e.g. South Bucks District Core Strategy. Should development proposals within or outside of Buckinghamshire have the potential to impact upon this landscape designation, compensation should be provided. In any event, opportunities should be sought to improve the resilience of this ecological landscape in the midst of intense development pressure.

The Sustainability Assessment recognises the loss of priority habitats (Section 41 habitats of principle importance, Natural Environment and Rural Communities Act 2006) and acknowledges the need to compensate at an approximately 2:1 ratio. Given the time and uncertainty for these habitats to establish to a point of equivalent functionality I would recommend a higher ratio e.g. 3:1. Replacement habitat should also be like-for-like or of a habitat of greater distinctiveness. In any event, replacement habitat should be strategically placed with landscape scale conservation the target. To this end it would be sensible to create, enhance or restore habitat within the Colne Valley Park and potentially the Colne Valley BOA.

### *SUDS and flood management*

Where SuDS installations are proposed it should be noted that the SuDS triangle comprises of water quality, water quantity and amenity/biodiversity. Therefore, biodiversity features, additional to those incidental to the engineered solution should be integrated into the SuDS design.

It is noted in Table 11.1 of the Sustainability Assessment that the impact to water quality will be of a 'high' magnitude and long-term with only medium reversibility. It is therefore paramount that every effort be made to minimise water quality impacts, sufficiently monitor and provide remedial measures up front in the event that impacts do occur.

The two aspects together have the potential to significantly impact upon the River Colne and by extension the Colne Valley Park and Colne Valley Biodiversity Opportunity Area. A net gain for biodiversity should be the target and well-evidenced

and thorough plans should be made and adhered to in order for to see net-gain realised. The cumulative impacts to this area (inclusive of High Speed 2) must be fully considered.

## **Noise and Air Quality**

Please refer to the submitted comments made by South Bucks District Council for these topic important areas. SBDC have commented on the potential impact to health, quality of life and other parameters with regard to worsened air quality within the southern part of the District. They also comment that Richings Park and Dorney would expect to see an increase in noise.

## **Carbon**

If Heathrow is selected as the preferred location for expansion, then the Extended Northern Runway (ENR) options is the preferable option from a carbon and climate change perspective, due to its lower lifetime CO<sub>2</sub> emissions. As the difference in emissions over the 60 year appraisal ENR and NWR options is approximately 12.5% however, the potential differences in air quality and flooding impacts are likely to have a far greater bearing on the overall environmental impact of the final option. As such, unless other environmental impacts are found to be equal between the ENR and NWR options, we suggest that the carbon impact is not a deciding factor if choosing between only the Heathrow options.

That said, the overall carbon impacts of both Heathrow options should be considered as “highly adverse” and not “adverse” as set out in the sustainability assessments for each option. The explanation given for not considering the effects to be “highly adverse” does not in our view provide sufficient reason for the reduction in classification. Responding to these reasons in turn:

1) *“system wide surface transport impacts, which show a comparative carbon “saving” of developing at Heathrow as opposed to airports with higher surface access carbon impacts”*

We do not believe this is a valid reason for reducing the determined level of impact. The fact that other proposals may have higher carbon impacts (either in other areas or in total) does not reduce the actual impact of the projected emissions for other options. Whilst lower emissions for one option may lead to the view that the impacts are comparatively less adverse, this does not mean their actual impact has been reduced.

2) *“fact that our assessment assumes a carbon cap or trading scheme, both of which would limit the adverse impacts”*

Assuming that a cap or trading scheme was established and successfully limited the emissions of the aviation sector (or the emissions from any of the proposals alone) does not suggest or guarantee that the limited impacts would not be highly adverse. With the Heathrow options each projected to increase emissions over 60 years by approximately 210-237 million tonnes of carbon, it is does not seem credible that this should not be considered a highly adverse impact.

In our view, the only factors which could reasonably lead to the evaluated impact of the carbon emissions of any project being at a level less than “highly adverse” would be an absolute reduction in the projected emissions from the proposal. However, as the Gatwick option is also considered to have adverse impacts whilst having 60 years emissions approximately 1/3 of the Heathrow options, the size of the reduction necessary to achieve this would not appear to be achievable.

## **Conclusion**

While proposals to expand Heathrow either through a runway extension or the creation of a new runway could have implications for Buckinghamshire, the creation of a transport hub at Iver will undoubtedly have the biggest impact. We therefore welcome the Airports Commission observation that this proposal does not deliver the benefits that could potentially be realised by WRAtH, nor will the hub offer anything more in terms of facility provision when compared to on-site operations. The creation of a transport hub at Iver will inadvertently cause delay for the majority of passengers travelling on other lines. The County Council also raises serious concern as to the implication that Local Authorities may be expected to contribute towards funding the infrastructure associated with the proposals. Through both options for Heathrow, it is also likely that the District will be expected to accommodate both new and displaced housing and commercial property. Further, the local road network is likely to experience significant adverse impacts as a result of major construction schemes, such as those related to tunnelling the M25 or the transport hub. This area must be looked at in more detail if the Heathrow schemes are to progress.

Given the above, while the expansion of Heathrow could create employment and investment opportunities which would enhance the economy of Buckinghamshire, on a localised basis this has the potential to be outweighed by a number of negative implications that would be imposed on the County. On balance the County Council is broadly supportive of expansion at Heathrow, however these negative impacts will require thorough analysis and detailed discussion to enable full mitigation measures and compensatory agreement where applicable, should the proposal progress.

Thank you for providing this opportunity to comment, we look forward to further opportunities to engage with you.

Yours sincerely,

