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SOUTH BUCKS
District Council

LEADER OF THE COUNCIL

Sent by email only:

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Dealt with by: Cllr Ralph Bagge
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Date: 24th May 2017

Dear Sirs

I enclose South Bucks District Council's response to the Consultation on Draft National Policy Statement on new runway capacity and infrastructure at airports in the South East of England.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ralph Bagge', with a long horizontal flourish extending to the right.

Cllr Ralph Bagge
Leader
South Bucks District Council

enc



**INVESTORS
IN PEOPLE** | Bronze

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South Bucks DC– Response to Heathrow National Policy Statement

Introduction

1. This response is on behalf of South Bucks District Council
2. We are members of the Heathrow Strategic Planning group who are sending a joint response which we endorse. This important group is working to produce a sub-regional strategic plan to influence the future planning of the sub-region in terms of locations for housing, jobs and infrastructure including maximising economic opportunities created by airport expansion. This work will influence the Local Plans currently being produced by Group members outside London. But its success will be very much dependent on the proposed policies being developed for the new London Plan. The Group is also working with Heathrow Airport Ltd to agree the evidence prepared (where possible) to provide a Statement of Common Ground between the various parties when the Development Consent Order is submitted.
3. South Bucks by virtue of its proximity to the proposed new runway (less than 700m from the boundary) will be a host authority in terms of the Development Consent Order. Environmental mitigation and diversion of the River Colne is likely to be proposed within the District. There may also be other impacts such as the use of the Colnbrook Branch line and sidings during construction. We are in discussion with Heathrow Airport Ltd on this matter.

Description of the Area

4. South Bucks forms the southern part of Buckinghamshire and adjoins the London Borough of Hillingdon and Slough Borough to the east and south. The Great Western Mainline passes through the southern part of South Bucks serving Iver, Burnham and Taplow (these stations will in the future be served by Crossrail/Elizabeth line) and Chiltern Railways services to Aylesbury and Birmingham pass through the towns of Denham, Gerrards Cross and Beaconsfield. These services enable many of our residents to commute to London. In most respects the District is well served by rail and road particularly as the M25, M4 and M40 also pass through. The one major exception to this is access to Heathrow airport. Access is only possible by road unless one travels by train into London and then back out. Many travellers to Heathrow therefore drive particularly in view of the proximity of Heathrow to the southern part of South Bucks, for example Iver is the location of many airport workers homes and is only 5 miles from Heathrow Airport but has no bus service to the airport. This (unnecessary) traffic adds to congestion on the motorway network. There are limited bus services to Heathrow from Beaconsfield, Gerrards Cross and Denham but not frequent and inconvenient for most residents.
5. One third of the District is within the Colne Valley Regional Park which is an important recreational resource for residents. South Bucks Councillors are amongst the Directors of the Community

Interest Company that manages the Regional Park and the Council contributes to the funding. The Regional Park is heavily impacted by the HS2 viaduct in the North East of the District and suffers from the numerous major infrastructure projects affecting the District. It will be important that the Heathrow expansion proposal, which will partially sever the southern part of the linear Regional Park, provides significant mitigation and enhancement.

6. 87% of the District is within the Metropolitan Green Belt. This undeveloped land helps create an excellent quality of life for the residents not least through recreation opportunities within the Regional Park, which includes several other country parks (Denham, Black Park and Langley) and publically accessible land alongside the River Thames, at Cliveden (National Trust) and Burnham Beeches (City of London) as well as the internationally renowned rowing lake at Eton Dorney. There are however significant affordability issues; pressure from outward migration from London pushes up house prices and together with limited redevelopment opportunities, results in Gerrards Cross and Beaconsfield (the two largest settlements) having an average house price of over £1m.

We will work with Heathrow Airport Ltd to minimise the impacts of their proposal on the Colne Valley Regional Park and the Green Belt and seek enhancements to the landscape, biodiversity and recreational opportunities during on-going negotiations. We support their ambition to create a Greener Heathrow by reducing their carbon footprint as part of their expansion proposals.

Major Infrastructure Projects

7. The District is under significant pressure from major infrastructure projects such as HS2, Western Rail Link to Heathrow, M4 Smart Motorway and the forthcoming M25 Smart Motorway (junctions 10-16). We also have a proposal for a new motorway service area between Junctions 15 and 16. Construction impacts particularly from heavy goods vehicles creating noise, vibration and air quality issues with no obvious benefits to local residents are a cause for significant concern. One particular corner of the District, Iver, already affected by motorway noise from the M4 and M25 is now the location of Western Rail Link to Heathrow construction, a new depot and track access for Heathrow Express, widening (Smart Motorway) of both the M4 and M25, a potential new motorway service area on the M25 and now a proposed third runway bringing the airport within 700m of the boundary of the District. Several of these projects will happen either together or consecutively, exacerbating the cumulative impacts. Air quality has already deteriorated markedly in Iver and an AQMA/Clean Air Zone designation is imminent. Linear AQMA's already exist along the motorway network. The DfT is aware of these multiple impacts affecting this small part of the District but so far has yet to offer or even contribute towards a viable solution.

We ask the Department of Transport for a coordinated response to the various infrastructure projects, some of which will deliver surface access improvements to Heathrow, taking account of the significant cumulative impacts from construction on the local road network, local communities and

the environment. We also ask that the delivery of the Iver Relief Road be considered a priority project to be built before the new runway is constructed.

8. The Dorney and Taplow area is also affected by the demolition and rebuilding of three M4 motorway bridges as part of the Smart Motorway project and the communities including local primary schools could be severely impacted by aircraft noise when the runway is completed.
9. In addition these multiple construction projects are putting the local road network under considerable pressure. The roads in the south and east of the District are already vulnerable when severe congestion on the motorway network forces traffic off and onto the local roads.

Burnham Beeches SAC

10. Burnham Beeches is a Special Area of Conservation and is vulnerable to visitor pressure and air quality impacts. The Council has been working with the City of London who own the majority of the site to manage the visitor impacts but are finding the air quality impacts – in terms of increased nitrogen deposition affecting the health of the trees – more difficult to resolve, particularly as the busy A355 link between Slough and Beaconsfield runs within 200m of the site. This is recognised in the Appraisal of Sustainability as a likely significant affect requiring mitigation.

We look forward to working with Heathrow Airport Ltd on appropriate mitigation.

Provision of surface access to Heathrow

11. It is recognised that Crossrail and Western Rail Link to Heathrow will improve access to the airport significantly from the West, however, few of the residents of South Bucks in particular and Buckinghamshire as a whole will benefit. There are however other proposed links that may have benefits. Firstly Chiltern Railways plan to access other rail services at the Old Oak Common interchange, if it comes to fruition this will benefit residents in Denham, Gerrards Cross, and Beaconsfield and stations beyond. . An improved network of bus/coach services will also be required perhaps involving coach hubs and spokes. Currently Heathrow provides that function – could this be changed by an outer network of coach hubs? However, unless journeys are convenient, seamless and of good value, passengers travelling with children and/or heavy luggage may still prefer using their car or a taxi unless adequate incentives are proposed. It is imperative that these other schemes are progressed in good time as well as those identified in the NPS to improve surface access to Heathrow from the wider hinterland. It would be better if the National Infrastructure Commission was tasked with the objective of improving surface access from areas close to the airport which currently have poor accessibility.

Likely Local Impacts

Aircraft Noise

12. The current consultation events have concentrated on present overflow areas particularly those in London and have not made non overflow areas aware that under the Runway 3 proposals they could be affected. The excuse given is new flight paths are not yet known other than the landing/take off points. These could then be straight line or curved approaches. Our communities including primary schools, of Taplow and Dorney and perhaps Burnham are at the western end of the new runway and will be overflowed for the first time. It also appears that if two runways are in operation at that same time it is more likely that aircraft using the NW runway will need to turn north over the District to avoid collisions. It is not known yet however what impact this will cause but it is likely to cause significant nuisance/disturbance to residents currently undisturbed by aircraft noise. Material obtained by Heathrow Airport Ltd show that respite will only apply once in every four periods.

Specific points to note are:

- The noise contours do not extend to South Bucks area, and the evidence base for noise levels is very poor.
- Mitigation will be informed by the definitive position on airspace routes which are currently undefined.
- A 6.5 hour ban on night flights is proposed. However, the WHO guidelines for night time noise extend to an 8 hour period in terms of health effects. We consider that Local Authorities would not be in the best position to enforce any breach of noise condition, and a statutory independent aviation noise authority as referred to in the package of accompanying measures proposed by the Commission would be more appropriate.
- As with air quality, accepted mitigation strategies in London, are to a lower standard than that would be normally acceptable in South Bucks. i.e. the use of mechanical ventilation. The Council does not promote the use of mechanical ventilation as a solution. How it is maintained / repaired and how the use is enforced for the lifetime of the development is not clearly defined (or enforceable).

Ground Noise

13. The communities in Iver (including Richings Park the closest to the proposed runway) already state that ground noise is an issue, primarily in the evening when the motorways are quieter. The new runway will of course be much closer to Richings Park residents in particular and it will be essential that noise barriers are erected alongside the southern side of the M4 to prevent ground noise disturbance.

Air Quality

14. The new runway must be deliverable within the legal requirements on air quality and greenhouse gas emissions. We await the government's new commitment and road map as to how this can be achieved. Specific local concerns are:
- Whilst it has been reported that the UK has already breached EU NO₂ limits in London for 2017, this does not cover relevant locations in South Bucks. The M25, M40 and M4 corridors have been declared AQMAs, and should be included as areas of relevant exposure, as defined by Defra guidance.
 - Surface transport has been identified as the main driver on air quality.
 - DfT analysis of vehicle emissions requires further evidence.
 - Construction phase vehicles are likely to have the greatest impact on local air quality in South Bucks if not suitably managed (in addition to the many other NIPs running concurrently)
 - The Government is relying on people switching to cleaner cars but there are no clear policies in relation to this.
 - There is concerns over the focus on "London" which is an AQMA in its entirety, and therefore with very different adopted local standards. Residential properties are not included in the linear AQMAs in South Bucks. (Note, there are "Hotspots" within South Bucks which are likely to come close to exceeding the objective for NO₂ in the coming years if not adequately managed).
 - Accepted mitigation strategies in London, are to a lower standard than what would be acceptable in South Bucks. i.e. the use of mechanical ventilation. Environmental Health does not promote the use of mechanical ventilation as a solution. How it is maintained / repaired and how the use is enforced for the lifetime of the development is not clearly defined (or enforceable).

Soils and Contaminated Land

15. Agricultural land in South Bucks that is proposed for flood storage and environmental mitigation is classified as Grade 1 for which the NPPF protects (para.112). There are also large areas in the Iver area that are classified as contaminated land.

Landscape

16. The large area in the District designated as Colne Valley Regional Park (CVRP) is protected in Local Plan policy terms. Mitigation proposals to enhance and replace affected parts of the CVRP should create new recreational opportunities and green and blue infrastructure in consultation with affected local communities. Opportunities should be taken to compensate for areas of the Regional Park that will be lost under an expanded airport. The Chilterns AONB may also be adversely affected by increased overflying.

Traffic congestion

17. The M25 SW Quadrant study has concluded that it is not practical to widen this part of the M25 further (except increasing capacity through a Smart motorway between junctions 10-16) and instead suggests improving parallel roads such as the A404 to form an outer connection between the M40 and the M3. This is essential and should be carried out as soon as possible. We are very aware that the local network between Denham (junction 16) and Slough (M4) becomes exceptionally congested when the traffic on the M25 frequently comes to a standstill. This has led to calls for a local solution, an Iver relief road. Increased commercial and private traffic during construction and access to the future expanded Heathrow will put added pressure on the local highway network and bring the need for a relief road (to be partly delivered through proposed housing development identified in the emerging Local Plan post 2019) forward. South Bucks welcomes the proposal by the Chief Executive of HAL to use the Colnbrook Branch line for construction which should dramatically reduce the number of HGV's on the roads. The sidings of this branch line are in South Bucks District. The branch line has limitations however, in that it can only be accessed from the east (from London) and not from the west. This could mean that the sidings are used to bring construction material by HGV from the west. In which case there would be an unacceptable increase in HGV traffic on the local roads within the District.

We welcome discussions with the DfT regarding resolving local traffic congestion and the delivery of the Iver Relief Road.

Airport Parking

18. No assessment has yet been made as to where the current on airport parking will be relocated to once the new runway is constructed. It may also be proposed that a new park and ride facility for the airport could be created.

The Council is concerned that there will be increased pressure for both Airport parking and demand by private parking companies on the Green Belt within the District.

Freight traffic

19. Heathrow Airport Ltd has suggested that freight traffic could double. There is concern that this could lead to an increase in the demand for logistics and warehousing accommodation and also add to existing congestion with a knock on impact on noise and air quality. Employment land predictions carried out for local authorities preparing new local plans indicate significant existing demand for distribution and logistics facilities that cannot easily be accommodated due to Green Belt restrictions and high land values. The Councils are therefore seeking reassurance on these matters as a matter of urgency.

The Council recognises the ambition of Heathrow Airport Ltd regarding the 'no net increase in traffic' but is uncertain bearing in mind the increase in freight traffic and the current inaccessibility of much of the District to the airport by public transport, how this can be achieved.

Economic Opportunities

20. South Bucks is already the location of a number of international businesses (Martin Baker Aircraft, Bosch, IHG etc.) which have located in the District to take advantage of the good strategic road and rail links and proximity to Heathrow. Pinewood studios located in Iver Heath is internationally renowned for film and TV productions.

We welcome the economic opportunities that the third runway will bring to the District subject to no impact on traffic on our local roads and a minimal impact on the Green Belt.