



# Windlesham Parish Council

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28<sup>th</sup> March 2018

Dear Sir/Madam,

Thank you very much for the opportunity to comment on the Heathrow Airport Expansion and Airspace Principles consultations. This letter is to be taken as Windlesham Parish Council's (WPC) formal response.

The Council would like to raise concerns over a number of elements pertaining to the consultation, namely: air-quality, noise, community displacement and traffic.

Whilst we acknowledge that Windlesham Parish Council is outside of the area likely to benefit from mitigation planned for the above expansion, we would like to stress that the impact of the expansion will be felt within the three villages (Windlesham, Bagshot and Lightwater) and as such, our concerns need to be heeded.

As the details of the proposal are in some cases still very sketchy, WPC is not necessarily specifying a preferred option but wishes to see finalisation and development of detail as soon as possible in order to do so.

The Council is concerned that existing air pollution limits are already exceeded, in and around both the local and Heathrow area, and that additional aircrafts, no matter how efficient, will add to that. To that end, more efficient aircrafts must be a pre-condition of aircraft operation and not something to work on with operators.

The Council is further concerned that Surrey Heath will be pressured to accept additional housing development to accommodate residents displaced by the expansion, this is a position we cannot accept.

## **PART 1 – AIRPORT EXPANSION**

We note in section 1 of the consultation that you state that Heathrow is part of Britain's National infrastructure and an economic engine for the local area.

### **Runway**

With respect to the new location of the runway, whereas the council has no specific opinion as to where best this should be positioned, we understand a decision needs to be made so that the future

of those living in the proposed runway location can be determined as soon as possible, as this has wider ramifications for the locality.

### **Realignment of the M25**

The consultation suggests a realignment of the M25 by repositioning it by approximately 150m to the west and lowering it into a tunnel. The realignment of the M25 is supported in principle by the Council but it generates concerns with reference to supporting roads in the already congested road network. The Council does not propose to have a definitive answer but our preferred solution is one that involves the minimum loss of residential units and a natural dispersement of traffic.

The M25 is one of the principal arteries touching the very edge of the three villages and as such the roadworks ensuing would have a detrimental impact on our residents, so we ask that during construction, clear working hours are adhered to and that no work is carried out during unsociable hours, resulting in heavy vehicles going through the parish's road network and also that all signage, be it physical or sat nav is clear, so that people coming to and from the three villages will find it easy to reach their end destination.

"We will ensure that our proposals do not result in disruption". While this point is highly commendable, the Council feels this is somewhat unrealistic. A scheme of this magnitude will undoubtedly generate disruption which is unavoidable. What is avoidable, is the management of expectations; Heathrow should not give the public unrealistic expectations. The report also refers to collector-distributor roads but alludes to complexity, cost and land issues. If this is to be taken as an indicator that this is an over ambitious plan, resulting in its abortion, the Council would prefer if expectations were managed and no false statements be made.

### **M25 Junctions**

Again, whilst the Council has no direct influence, we anticipate that the work ensuing from the Heathrow expansion will affect all collector-distributor roads to and from Heathrow, therefore option Family 1 - less civil engineering works and disruption would be preferable.

### **Local roads**

**A4 Diversion. A section of the A4 will be removed between Colnbrook and Sipson. The airport is proposing a replacement route to re-provide local connections**

Out of the presented options, Option 6c enables the least re-routing of x million vehicles and vehicle miles over the years and is therefore in the Council's opinion, the only sensible option. Local roads will take the brunt of all the additional movements created by Section 2.8 -Airport Supporting Facilities and Section 2.10 - Airport Related Development. This is unsustainable without a radical re-think of transportation of people and goods.

**A3044 Replacement. The A3044 connects the A30 Crooked Billet junction in the south to the A408 Cherry Lane junction near J4 of the M4 motorway.**

Following on from the point above, Option 2ai is the most sensible option, as it connects to the realigned A4.

**Stanwell Moor Junction. The road is located to the south west of the airport and connects the A3044, A3113 Airport Way (which provides access to M25 J14) and the Southern Perimeter Road.**

This is a fundamental junction and consideration should be made to how the existing junction (access to T5) can be upgraded to deal with increased traffic. Option 1 is the preferred option as it

redirects traffic through the A3113 into a roundabout, with potential free flow access to T5 at ground level to the north and Staines and Stanwell to the south.

### **On-Airport Cargo**

At the exhibition held locally, one of the displays promoting the increased business stated boldly that freight would double. The re-distribution of all those goods outwards will adversely affect the surrounding area road network with additional lorry and van movements. The Council wishes to once more remind Heathrow, that if the airport is indeed a key element of Britain's infrastructure, where the likely expansion will result in a net benefit to the economy, it will adversely impact the already congested road network, therefore a national approach to transport needs to be sought.

### **Surface Transport**

The Council is supportive of a wider surface traffic study and improvements on the already congested roads, however we find it difficult to understand how the already stretched Surrey Heath public transport infrastructure will be able to contribute to delivering your quoted figure of 55% of surface access passengers using public transport by 2040.

As mentioned in your introduction to the consultation, if Heathrow truly is part of Britain's national infrastructure then a national approach to traffic needs to be adopted here and we very much welcome the opportunity to discuss a dynamic and organic transport to and from the airport across the M3 corridor, which could include the three villages as part of the solution.

We understand that there are discussions about responsive transport to and from Heathrow for airport workers, where Heathrow's targets are to reduce the surface access to the airport by individual transport to a much lower figure than currently used. We would like the opportunity to evaluate how that transport can be incorporated into a wider public transport strategy across the M3 corridor to incorporate passenger transport and access to the airport.

The Council also understands that to facilitate reduction in individual access to and from the airport, Heathrow is looking at a preferential supplier system where taxi firms would buy what is essentially a permit to access the airport directly, whereas non-licensed taxi companies would not have access directly to the airport. We would like you to consider the impact this will have on our local taxi companies who will be detrimentally impacted, as it would likely be too costly to buy those permits. Again, we ask that you hold those discussions with WPC so that we can be included in this thought process.

### **Southern Rail Link**

The consultation suggests that there will be some work undertaken to support the development of a new direct link to the airport from the south. This work is particularly of interest to the Council as it could provide connections to the South Western Network going through/via Bagshot and it would go

a long way to improve the rail connectivity of the villages. We strongly support this approach which could see a dramatic reduction in surface traffic access to the airport, providing relief to the A30 and M3 and thus contributing to air quality improvements in the three villages.

### **Airport related Development**

"Hotels - 8,300 rooms by 2040". "More demand for office space", "more demand for services directly related to airport operations". The Council wishes to express concern that this increase in demand will result in extra traffic which is likely to impact the A30 and M3 corridors. As stated previously, WPC is outside the area likely to benefit from mitigations resulting from this expansion, but very likely to suffer the detrimental effects of the increased traffic. The Council's concern is that the predictable congestions caused by LHR Expansion, will cause loss of commerce to more local (to WPC) businesses.

### **Community Displacement and Land Acquisition**

The Council understands that for this ambitious project to go ahead, a number of houses will need to be demolished but we wish to express our concern in the displacement of the communities ensuing.

We understand that Heathrow have put together a scheme that makes it more palatable for the home and business owners to sell their properties, but this scheme does not consider, in our opinion, the impact that the land acquisition will have on established communities, nor does it suggest how to solve it. Whilst we leave this issue up to Heathrow in the hope that communities will be at the centre of your focus, we wish to make it clear that the three villages are already stretched when it comes to land and housing supply, due to our position within the Thames Basin Heaths Special Protection Area (TBH SPA) and its buffer zone of 400m, and its proximity to the green belt, SSSIs and the surrounding MoD owned land. As the three villages are considered outside of the area of mitigations, the Council believes the impact of the new housing requirement should not impact the three villages.

### **Noise**

As Heathrow is aware, noise has been a contentious issue in the three villages for some time now, with over 700 complaints on the subject made in the last year alone. The Council does intend to support its residents in this and where we appreciate that the perception of noise may be subjective, we completely understand that noise is measurable and therefore objective.

As such, we very much welcome the proposed ban on night flights. This will go some distance to helping residents adversely effected by the noise, especially in the early hours of the morning. For this reason, we would ask that the 6.5h ban be moved from 12 midnight to 6.30 in the morning and not 11pm-5.30am.

### **Air Quality**

The Council understands that Heathrow is committed to improving air pollution by adopting an incentive policy which will encourage airlines to upgrade their fleet to aircraft which will be less polluting and quieter. It is disappointing to see that Heathrow considers surface traffic to be the major cause of pollution, we do however look forward to seeing the integrated national strategy for airport transport implied by the document.

The Council's concern is the notion that the airport's cost of expansion fails to include any cost beyond a 2km radius of the airport. It is our understanding that the figures will be 2 - 4 times higher than those published in the official appraisal document. Surrey Heath and in particular the three villages have already experienced NO2 levels exceeding the expected limits expressed in annual mean.

We would like to draw attention to the fact that individuals do not breathe average air, therefore any figure in excess of the NO2 limits should be considered unacceptable, and as such measures should be taken to mitigate against current and future levels.

### **Natural Environment**

The Council recognises this to be a positive approach, but we would like to be reassured that Heathrow will be the main stakeholder in the maintenance of the environment surrounding the expansion area as per the diagrams on page 62 of the consultation documents. The Council would also like to draw attention to the opportunity to create cycle routes as part of the environmental transformation of the area. Cycle routes around the Heritage area and the water areas, will encourage visitors and get people cycling.

### **Historic Environment**

The Council notes, with sadness, that the proposed expansion includes the likely loss of the Longford Conservation Area and part of the Harmondsworth Conservation Area. This would result in the loss of a number of listed buildings and other heritage assets. We wish to defer this to Historic England as they are the experts in this field, but where possible, retention of historically significant buildings and areas should be retained.

## **PART 2 – AIRSPACE PRINCIPLES**

### **Flight Paths**

The consultation proposes three possible alternatives to future flight paths and its design principles. Option B is to be considered more desirable as it establishes that those areas that have not been subject to regular noise would continue not to be impacted upon. This would ensure that the three villages won't be affected by an increase in air traffic overhead.

### **Urban and Rural Areas**

Whilst preferring option B, the two options presented offer a different approach, however much of the area surrounding the three villages is of significant importance from an ecological and environmental point of view. We ask that due consideration is given to these areas, and future flight paths not affect these areas.

### **Noise and Emissions**

Both noise and pollution are important elements to consider but given that the new aircrafts will be less polluting and quieter, option A is to be preferred as it will mean a lesser impact over the designated areas.

### **Technology and Investment**

Investment in newer technology must be a prerequisite of the proposed expansion, as only by adopting best principles can we be guaranteed the best outcome for the affected areas.

### **Night flights**

Please see the Council's position regarding night flights expressed above under the heading of noise.

We trust our submission will be given full consideration and the Council wishes to be informed directly of the outcome of the consultations. We also wish to be notified of all future consultations regarding the airport expansion and changes to airspace.

Yours faithfully,



Sarah Walker  
Clerk to the Council