

Actions for Heathrow – Spelthorne AEC response

Economic Benefits

1. To give greater promotion to the opportunities offered within the Heathrow Academy to residents in the Borough seeking employment.
2. Ensure that there is sufficient warehouse space available for the increase in the capacity to export.
3. Heathrow to make a commitment to engage with Brooklands College, where a significant number of Spelthorne's students attend, to encourage and inspire local residents to access apprenticeship courses within the area

Cost

4. In order to achieve a more cost-effective solution, Heathrow should be required to actively work with different parties delivering more cost-effective and sustainable components
5. Heathrow needs to re-run its statutory consultation exercise once the masterplan has been significantly amended, and there is a credible business plan in place. Heathrow's estimated £32.5 billion expansion plans are neither cost-effective nor sustainable and need significant revision. This statutory consultation is premature
6. Heathrow must ensure that the expansion is genuinely at no cost to the British taxpayer.
7. Heathrow to propose and deliver genuine 'World Class' compensation for Spelthorne's communities.
8. There are insufficient positive proposals made by the Heathrow expansion to provide new, improved or compensatory land or facilities. Spelthorne requires the following:
 - Direct replacement of facilities lost
 - Compensatory provision for facilities (including open space generally) which is degraded by the scheme
 - Community compensation to make up for the general impacts of the scheme
9. Heathrow needs to properly compensate local communities for the prospective loss of around 220 Ha of green space and recreation facilities by providing suitable areas of alternative open space and facilities and, where appropriate, through the application of the Community Fund. Re-provided space must be equivalent or better than what is lost, in quantity and quality, and made available in perpetuity.
10. Heathrow to offer residents in Stanwell and Stanwell Moor a more "appropriate community compensation package" as stipulated in the NPS para 5.239 to 5.253 to also extend the Wider Property Offer Zone (WPOZ).
11. Heathrow needs to deliver on promises given to local communities (specifically Stanwell Moor) between CON 1 and CON 2 that they would be part of the Wider Property Offer Zone (WPOZ), and should stop backtracking.
12. A new Environmental Accord with Heathrow Airport that will enhance our natural environment and offsets Borough-wide 'safeguarding' impacts.

Engagement

13. Spelthorne requires Heathrow to engage with communities in a transparent way.
14. Spelthorne urge Heathrow to have a more open engagement strategy.
15. Spelthorne insists that Heathrow be honest about the benefits and dis-benefits of the proposals and the effects of the expansion, including temporary effects from construction, on the affected communities
16. Spelthorne asks that Heathrow improves its approach to engagement and fully engage with all those effected in a meaningful and transparent way. Further consultation will be required on key detailed aspects prior to DCO submission.

Community

17. Spelthorne asks Heathrow to finalise their Community Compensation Fund as a matter of urgency so that our communities are made fully aware of the compensation available to them and can engage in an informed way.
18. Spelthorne asks that Heathrow considers not only the direct effects of the proposed expansion but also the indirect or 'knock-on effects'
19. Spelthorne requests that Heathrow stop subjecting our most vulnerable and deprived communities, such as Stanwell Village and Moor, to the most significant and detrimental impacts of the proposed expansion.
20. Spelthorne asks that Heathrow prepare and conduct a detailed impact analysis for each of our communities, which has yet to be completed.
21. Heathrow to reconsider the current and narrow scope of the community consultation PEIR, which is still not concluded. The scope is far too narrow, in terms of both the stakeholders that it identified and the geographic boundary.
22. To consider the wider impacts on local communities especially those with protected characteristics and address issues that are sensitive to the evolving LGBT+ community

Noise and Health

23. Full details of the proposed 'parameters' and process for the replacement of Control of Pollution Act 1974 section 61 consent must be submitted to all stakeholders and the public for full consultation prior to submission of the Environmental Statement (ES); along with the proposed list of the Joint Planning Committee.
24. Drop plans for early growth of Heathrow Airport through the early release of 25,000 ATMs per year once the DCO has been approved. If the proposals proceed despite opposition from this and other local authorities, Heathrow needs to produce an accurate comparison of 'with development' and 'without development' contours need to be plotted. This information must be made available before the submission of the detailed Environmental Statement (ES).
25. Full details on the assessment and impacts of any replacement Compton Route need to be provided, along with any proposed mitigation scheme, if the early release of 25,000 ATMs before expansion still progresses, despite our and others' opposition.
26. The precise environmental limits mentioned below are proposed for inclusion in the DCO application. These must be submitted for full consultation with stakeholders and local communities prior to submission of the Environmental Impact Assessment. Any such limits must be quantifiable and reducing

- against the 2013 baseline. More details need to be worked up in the Environmentally Managed Growth proposals for an independent monitoring board to ensure they are robust enough in terms of enforcement.
27. For the protection of residents' health Heathrow must have regard to guidance provided within Building Regulations 2010, guidance document F (ventilation) in the design of insulation of affected properties.
 28. Heathrow to provide reasonable justification/clarification as to why the same values have been used for aircraft air noise and aircraft ground noise within the noise assessments, or to reassess noise levels based on standard methods/assumptions.
 29. Heathrow must provide further justification for the rate improvement in noise production from future generation aircraft used in the PEIR assessment, or update the assessment to account for the more realistic rate of improvement because there values may not fall as quickly as the current DCO analysis suggests. Heathrow to explore and justify the adoption of the selected intervention values, which must be reassessed to ensure that residents are fully protected and that anomalies are removed
 30. Heathrow be required to review the proposed night time departures and arrivals to ensure that residents receive the full 6.5 hours as required by the ANPS.
 31. To review the runway and alternation procedures to ensure that the residences of Stanwell and Stanwell Moor are given proper predictable periods of respite from aircraft related noise.
 32. Legal binding agreement is required of Heathrow that the 2013 noise baseline presented within the ANPS and the environmental limits proposed by themselves within Appendix A for Environmental Managed Growth are continually improved upon for the protection of public health.

Air Quality

33. A full transport assessment and revised detailed air quality modelling should be consulted on prior to DCO submission with routing and mode share scenario sensitivity testing and clarity of inputs and assumptions.
34. The ULEZ and vehicle access charge should be payable by all vehicles accessing any part of the airport campus. The ULEZ area needs to incorporate freight areas of the airport and all airport related development, not just terminal forecourts and car parks. Revenue from the charges should be ring-fenced for local transport infrastructure improvements and subsidising public transport fares.
35. Detailed air quality modelling is required for Staines Moor SSSI, Wraysbury Reservoir SSSI and the South West London Waterbodies SPA/Ramsar site. Resultant quantitative information will generate extensive new information on the simplistic qualitative assessment presented to-date and so further consultation is required before DCO submission

Construction

36. Commitment is required to meet a minimum 60% Public Transport mode share for construction workers. Additional mechanisms are needed in the Preliminary Outline Construction Worker Travel Plan (POCWTP).

Monitoring (air quality, dust, noise, odour, etc) is required within Spelthorne of constructional and operational phase impacts.

Independent monitoring and enforcement of implementation of CoCP and other environmental management plans. Firm commitments need to be made, and kept, for measures to manage construction impact.

Updated construction phase dust assessment, added assessment years between 2022 to 2030 and updates to baseline information still needed. Justification is required why construction traffic has been excluded from the no more airport related traffic pledge.

37. Routing of Construction traffic through the centre of Stanwell Moor is unacceptable. If alternative routing cannot be found, CSS11 should be discontinued as an option. The Transport Assessment for Construction and the Construction Worker Accommodation Strategy needs to be consulted on ahead of DCO submission. Transparency needed on what specific mitigation proposals will be and how they will be managed, monitored and enforced
38. Clarity and firm commitments are needed for communities on when 'temporary' construction sites will be restored to permanent use and the quality, quantity and nature of the end use.
39. The proposed Community Engagement Plan and other key documents relating to construction impacts need to be considered and consulted on in advance of the DCO submission.
40. Consultation needed before DCO submission on details in the Code of Construction Practice relating to working hours, in particular, locations and activities where 24/7 working may cause unacceptable effects.
41. Proper consideration of the need for worker accommodation on site and contingency plans for additional demand. Development and consultation required on Construction Worker Accommodation Strategy before DCO submission.
42. Protect residents from noise disturbance caused by construction by ensuring that Heathrow's Construction Management Plan complies with good practice and legislation.
43. Engagement needed on the proposed scope and timing of forthcoming ground and water investigations for land in the Borough. Consultation is needed on the site investigation data, risk assessments and interpretation well in advance of the DCO submission.
Clarity is appropriate on whether Heathrow will be mitigating and compensating local communities for the loss of agreed restoration schemes at temporary mineral processing sites.
44. Land set aside for airport drainage and pollution control should be fully justified and minimised. Further assessment is needed in respect of use of Hithermoor. Further justification is required of extent of land take at Mayfield Farm. Options for biological treatment need to be reassessed in light of the existing Heathrow trial.
45. Implications of preventing processing of minerals from King George VI at Hithermoor Quarry must be appropriately assessed and not dismissed. Discussions are needed with Surrey and Spelthorne about compensatory provision for loss of agreed restoration schemes at Hithermoor Quarry, Stanwell Quarry and Homers Farm.
Firmer commitments are required on transportation of raw materials and wastes by rail.

Health and Wellbeing

46. Heathrow need to act as an exemplar and in order to ensure that it delivers a world class compensation package it should apply the World Health Organisation (WHO) guidelines now.

47. Prior to the submission of the Environmental Statement (ES), a separate health impact assessment for each Heathrow community (Stanwell and Stanwell Moor for Spelthorne) for both the construction and operation phases needs to be carried out and submitted to stakeholders and the local communities in full consultation.
48. Heathrow (as part of their DCO) need to provide for additional Local Authority (LA) resources to ensure robust and independent monitoring and enforcement of the construction works can take place. This will ensure the health of residents is protected.

Airspace

49. Drop plans for Independent Parallel Approaches (IPA) as part of the early growth of Heathrow Airport for release of 25,000 ATMs per year once the DCO has been approved.

Surface Access - Transport

50. Reconsideration of parking strategy and consolidated parkway to the south and resulting concentration of traffic in Spelthorne. Full consideration to be given to the location and access/egress for the relocated petrol filling station to Stanwell Moor Road and resulting impacts on Crooked Billet junction.
51. Commitment to creation of a non-road cargo link between off-airport freight businesses south of the Southern Perimeter Road and the cargo operations within the airport boundary and inclusion within both the Masterplan and the DCO boundary to reduce HGV movements.
52. Given that DCO submission is not a consultation stage, we consider it vital that detailed, fit for purpose, transport modelling is undertaken and the results published prior to the DCO submission.
53. Spelthorne objects to the location, quantum and massing of the Southern Parkway and has concerns with Heathrow's overall parking strategy
54. Heathrow needs to ensure that Heathrow southern rail access is provided in order to meet their surface access mode share targets and their "no more traffic" pledge.
Heathrow needs to positively incorporate the Southern Light Rail (SLR) system into their masterplan proposals as this is the only option which can be deliver before the third runway becomes operational
55. The "no more traffic" pledge needs to be further refined and tested through the modelling work so that any redistribution of traffic movements can be fully assessed. Construction traffic should be included under the pledge and monitored as part of any review.
56. The proposed active travel proposals need to be fully integrated with the proposals for the green loop around the airport and need to be considered in more detail and consulted on in advance of the DCO submission. There is a need for a fully segregated crossing of the M25 completely separated from the complex upgraded Junction 14.

Parking

57. Heathrow to fund the implementation and enforcement of controlled parking zones, invest in alternative sustainable transport measures and implement local solutions.
58. Maintain existing cap on parking spaces from Terminal 5 inquiry and reconsider approach to consolidated parkways in two locations.

59. Heathrow to reconsider the approach to parking within the Masterplan to significantly reduce the size of the Southern Parkway and the quantum of parking spaces.

Green and Blue Infrastructure

60. Spelthorne requests that Heathrow review the ecological impact assessment on the completion of the ecological surveys, including a review of 'not significant' effects and 'scoped out' effects in terms of intra-project cumulative effects, so that impacts such as habitat loss and fragmentation are clearly assessed.
61. Spelthorne requests greater transparency in relation to the remaining ecological surveys that are to be undertaken, including information on the timing of such ecological surveys.
62. Spelthorne requests that Heathrow provide further information on proposed biodiversity mitigation for Staines Moor SSSI with clear links to identified effects to ensure adequate and appropriate development of mitigation.
63. Spelthorne requests that Heathrow provide further information on the proposed water environment mitigation for the Water Framework Directive (WFD) features within Spelthorne with clear link to the WFD assessment.
64. Heathrow must ensure that future air transport emissions (including international aviation) is not contextualised against the Committee on Climate Change (CCC) Further Ambitions scenario, which requires a reduction in aviation emissions to 30 MtCO² in 2050.
65. Spelthorne requests that non-CO² air transport emissions are considered as part of the quantification of Greenhouse Gas (GHG) emissions.
66. Spelthorne requests that the claim that the growth in CO² emissions from the DCO Project would be offset under Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) is assessed more fully including addressing the concerns of CORSIA's effectiveness.
67. Heathrow needs to properly compensate local plot holders for the loss of The Vineries Allotment Site, Spout Lane, Stanwell Moor. This needs to be in the form of compensation for current plot holders and reprovision of an allotment site with a commuted sum to ensure adequate maintenance.
68. Heathrow must adopt high level proposals for managing surface water run-off to avoid any increase in flood risk downstream, protect water quality and manage groundwater pumped from excavation.

Strategic

69. As soon as is appropriate in the process, Heathrow to provide Spelthorne with detailed information regarding how the local authority fits in with the mitigations in place which have resulted in 'no significant effect' on the human and non-human receptors identified in the event of a major accident and disaster (MA&D). Additionally, where the mitigation is dependent on other parties fulfilling a duty, provide further details on the expected response from Spelthorne should the mitigations fail.
70. Spelthorne asks that Heathrow steps outside of their models and uses real information instead of an overreliance on computer models and desktop analysis.
71. Spelthorne is concerned that lessons have not been learnt from the building of Terminal 5, the HS2 project or the Olympics.
72. Spelthorne is concerned that each of the PEIRS has been considered and assessed in isolation and therefore the wider picture or cumulative effects is not considered.

73. Spelthorne asks that Heathrow stop trying to pass over statutory duties to third parties.
74. Spelthorne asks that Heathrow widen the scope of their consultation and include those who are newly impacted or who might be and those in hard to reach groups.

Legacy

75. Heathrow to offer tangible legacy benefits as part of its Masterplan and set out funding sources with governance structures prior to DCO submission.
76. Heathrow to provide an injection of capital to fully fund a new improved community facility to serve both Stanwell Moor and Stanwell Village, and provide an on-going revenue stream to enable this facility to be run in perpetuity. It could include a 4 court sports hall, community meeting room, 2 multi-purpose studios, 3G pitches, MUGAS plus other formal and informal play facilities. This should be seen as part of a package to recompense both localities for the loss of open land.

Enforcement

77. Heathrow must ensure that all construction related works are procured in a way that ensures that their contractors and sub-contractors do not breach planning, public health and environmental protection regulations. Control measures should be designed to prevent problems at source wherever possible. Through robust contract management, Heathrow must ensure that they properly monitor contractors/sub-contractors and that they take swift remedial action to ensure compliance with these requirements. Where intervention by public authorities is required, Heathrow should agree to underwrite the costs of enforcement action which is rendered necessary by public bodies as a result of Airport related development. Spelthorne (and other local authorities) should have enforceable rights in all Heathrow construction related contracts against both Heathrow and third parties for unrecoverable enforcement costs.
78. Heathrow must ensure that there is an effective Traffic Management Plan (TMP) to control deliveries to the development sites and reduce the impact of road freight on Spelthorne's residents. This should include the implementation of engineering solutions (e.g. width restrictions) where appropriate to prevent HGVs from passing through residential areas to access construction sites; and an automatic traffic management system including strategically placed CCTV cameras with automatic number plate recognition to track HGV movements and ensure that only designated freight routes are used at times which are specified in the agreed TMP. Heathrow should fully fund the implementation of these systems and agree to underwrite the costs of all consequential monitoring and enforcement action throughout the duration of all construction activity (not just the third runway).