

DRAFT DETAILED RESPONSE TO HEATHOW AIRPORT EXPANSION CONSULTATION

Economic Benefits	p. 1
Cost	p. 6
Compensation	p. 10
Engagement	p. 19
Community	p. 25
Noise and Health	p. 34
Air Quality	p. 49
Construction	p. 57
Health and wellbeing	p. 74
Surface Access – Transport	p. 81
Parking	p. 96
Green and Blue Infrastructure	p. 103
Strategic	p. 118
Legacy	p. 130
Enforcement	p. 135
Glossary	p.140

Economic Benefits

Career Opportunities Offered Through Heathrow Academy

Action

To give greater promotion to the opportunities offered within the Heathrow Academy to residents in the Borough seeking employment.

Title

Employment/Skills & Training opportunities available at Heathrow through the Training Academy.

Topical Issue

Spelthorne supports the third runway in principle as if it does not materialise none of the benefits associated with the expansion will happen and if the 'Boris Island' project was to re-emerge, Heathrow would slowly close down operations and all the benefits connected with having the UK's number one airport on Spelthorne's doorstep would disappear including the 70,000+ direct jobs situated at the airport and 114,000 jobs in the supply chain.

Evidence

The 2018 data shows that 3,525 of Spelthorne's residents were employed by Heathrow; that is 7% of the total working population of the Borough. Around 114,000 jobs outside of the airport form the supply chain providing indirect employment opportunities for residents situated around the airport; this accounts for around 22% or 1 in 5 of local jobs.

The Heathrow Academy provides a gateway for employment through the training delivered which enables candidates to be 'airside ready'. This provides opportunities for jobs in retailing, aviation, logistics, caterers, bureaux and construction. The target audience are people who are currently unemployed and in receipt of Job Seekers Allowance. In 2018, 25 residents found employment through this route and 14 people started an apprenticeship. Since 2014, 96 Spelthorne residents have been placed into work through the Academy alone.

Heathrow also run an annual jobs & Careers Fair and have done for around 15 years for the benefit of young people in schools and colleges within the 5 boroughs that surround Heathrow (Spelthorne, Slough, Hillingdon, Hounslow and Ealing). 364 people from Spelthorne attended in 2018 gaining an insight into jobs available at Heathrow as well as their supply chain. This also leads to many people being offered formal interviews for employment after the event.

Each year Heathrow run a Primary School Challenge which is open to all Spelthorne's year 6 primary school children. The challenge helps to reduce the skills gap in STEM related subjects by giving an opportunity to code the cargo journey of items that are exported through the airport; 470 of Spelthorne's children participated in 2018. Since the Challenge was introduced, 29,861 young people have participated across the five boroughs surrounding Heathrow.

Heathrow also run a Secondary School Challenge for year 8 students to promote opportunities in engineering through coding a robot based upon the self-driving pods in Terminal 5. 436 students participated in the challenge in 2018. 21,429 students from schools around Heathrow have participated in this challenge since its inception.

The delivery of a third runway is expected to increase the number of jobs at the airport from 72,700 to 99,500 (increase of 26,800) by 2035.

Nuance

The ANPS states:

5.266 The Government expects the applicant to maximise the employment and skills opportunities for local residents, including apprenticeships

Heathrow will create thousands of new job opportunities and provision for training and new skills, but these will not be exclusive to Spelthorne or any other borough. Access to jobs and training will be the responsibility of Spelthorne residents, coupled with the ability of the Council to signpost and encourage people to apply. The same applies to local businesses connecting to the Heathrow supply-chain, they will need to take the initiative, or let others seize the opportunities available.

Division

Economic Benefits

DRAFT

The Need to Maximise Heathrow's Capacity to Export

Action

Ensure that there is sufficient warehouse space available for the increase in the capacity to export.

Title

Maximising the ability of the UK to be a world class exporter post Brexit.

Topical Issue

Spelthorne is supportive of increasing connections to additional cities around the world, to avoid the UK losing its place in the world as the 5th largest economy as other nations compete for markets to increase trading opportunities. Both France and India are in a position to overtake the UK in 2020 and without investment to increase global connections, the UK may slide further down the ladder which will impact on the UK as a place to do business and the future prosperity of the country.

Evidence / Benefits

The latest available data from Heathrow is for 2017, this shows that the value of UK goods that travelled via Heathrow was £106B, this is more than Britain's biggest container ports combined (Felixstowe and Southampton £95B), 33% of all UK long-haul goods by value travel via Heathrow, Gatwick by comparison is 0.23%. 1.7M tonnes of cargo by volume travelled via Heathrow which is 64.7% of the volume of UK air freight.

In 2017 Heathrow exported £48bn worth of goods to countries situated *outside* of the EU and Switzerland. With a third runway, estimates by the Government and the Airports Commission put benefits to passengers and the wider economy between £61 billion to £211bn over 60 years. This would be critical in helping the UK to increase the share of the market with the rest of the world beyond the EU, and help to maintain and create jobs as well as increasing prosperity. In 2015, Heathrow carried almost double the amount of freight than all other UK airports combined, with the expansion, cargo capacity could be doubled resulting in the ability to increase imports and exports as well as job creation. However, its runways are currently operating at 99% capacity, which leads to delays, disruptions and ticket unavailability, while airlines have chosen other European hubs like Paris and Frankfurt to grow. With expansion, there would be up to another 40 new trading long-haul destinations boosting the capacity to trade with the rest of the world, as well as the number of tourists that could visit the UK.

The economic benefits of expansion would not be limited to the south-east, it also promises benefits for Scotland, where it could potentially create up to 16,000 jobs; in the East Midlands, it could create 12,900 new jobs and economic benefits of up to £15bn. Last year, Heathrow had 78 million passengers, but with the proposed expansion, Heathrow could have the capacity for 130 million passengers. With regards to tourism, in 2017 alone, there were 39.2 million inbound visits to the UK with overseas visitors spending as much as £24.5 billion.

Nuance

The ANPS states:

International connectivity and strategic benefits, including freight

3.18 Heathrow Airport is best placed to address this need by providing the biggest boost to the UK's international connectivity. Heathrow Airport is one of the world's major

hub airports, serving around 180 destinations worldwide with at least a weekly service, including a diverse network of onward flights across the UK and Europe. Building on this base, expansion at Heathrow Airport will mean it will continue to attract a growing number of transfer passengers, providing the added demand to make more routes viable. In particular, this is expected to lead to more long haul flights and connections to fast-growing economies, helping to secure the UK's status as a global aviation hub, and enabling it to play a crucial role in the global economy.

It is worth noting the level of investment in UK airport capacity by comparing Heathrow with some of the UK's close European neighbours. Schiphol airport in Amsterdam has six long runways, Charles de Gaulle in Paris has four runways whilst Orly Airport, which is also situated in Paris, has 3. Frankfurt Airport in Germany has 4 as does Madrid-Barajas Adolfo Suárez Airport in Madrid; Leonardo Da Vince airport in Rome benefits from 3 runways.

Division

Economic Benefits

DRAFT

Heathrow's Commitment to Spelthorne Securing More Apprenticeships

Action

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 construction sector.

Title

Apprenticeships

Topical Issue

If the third runway does not materialise, the explosion of opportunities for residents to learn a trade or existing staff to upskill competencies through obtaining new qualifications will not happen. The skills and knowledge gained through the apprenticeship programme is transferable outside of Heathrow and enables people to go on and develop their careers in future years, whether in or outside of Heathrow. There will be competition for the nine boroughs (the current position of 5 boroughs will be expanded to 9 as the employment footprint of Heathrow expands with the demand for labour stretches further afield) that surround Heathrow for the apprenticeship programme, and places on it cannot be guaranteed for Spelthorne.

Evidence / Benefits

In 2016, there were just over 300 apprentices being delivered across the airport through the Heathrow Academy, this number would double with the opportunities that an expanded Heathrow would bring.

With expansion, Heathrow would double the number of apprentices across the airport to 10,000 by 2030 and support wider programmes to champion employability skills training. Many of the 10,000 apprentices would be brand new posts, whilst others would include existing staff at the airport who participate in the apprenticeship programme to access training for new skills and qualifications which would upskill the workforce and enhance opportunities to progress careers.

Spelthorne is a location with fewer qualifications than surrounding boroughs and less qualifications compared to the rest of the south-east region. The apprenticeship programme could help inspire Spelthorne residents to go on to obtain higher qualifications, and compete for some of the quality jobs available.

Nuance

The ANPS states:

5.265 Heathrow Airport should put in place arrangements for the delivery of the 5,000 new apprenticeships which it has publicly stated would be created. Heathrow Airport should set out the timetable for delivering the apprenticeships, provide information on the areas and skills to be covered by these apprenticeships, the breakdown between opportunities to be created within the core airport and those being offered by companies within its supply chain and other airport-related businesses, and the qualification level and standards which they will need to achieve. Heathrow Airport should also set out how it will publicly report progress against the target.

Division

Economic Benefits

Cost

DRAFT

Expansion Neither Cost-Effective nor Sustainable

Action

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.

Title

Lack of robust business plan - expansion plans are neither cost-effective nor sustainable

Topical Issue

In the absence of a business plan that articulates efficient costs and finance, affordability and deliverability, as well as one that reflects consumer views and preferences to the fullest extent practicable, the expansion plans are far from settled. The statutory consultation is therefore premature and needs re-running following extensive revision of the masterplan and associated re-phasing. The cost-effectiveness and sustainability of the scheme will need to be underpinned by meaningful consultation with stakeholders at the right juncture in due course.

Evidence

In funding terms, the NPS principally focuses on Heathrow being able to show that there are no financial impediments to the scheme proceeding. Delays in Heathrow's expansion schedule already mean that a price control business plan will not be practicable by the middle of 2019 and the CAA have confirmed that this should now be provided by the end of December 2019.

Heathrow expansion costs, currently pegged at £32.5 billion, are spiralling out of control and must be reigned-in, phased and managed properly. That requires a fundamental re-evaluation of the proposed infrastructure and costs for expansion. The ill-conceived land-locked airside Northern Terminal is a prime example of a hugely inefficient, badly located and wholly superfluous white elephant.

Spelthorne is greatly concerned at the mushrooming costs associated with the scheme's early development and the substantial risks generated for airlines and passengers as well as local and national taxpayers. Indeed, we openly question whether the expansion costs are genuinely necessary or provide value for money.

The CAA asserts (in its Economic regulation of capacity expansion at Heathrow airport: consultation on early costs and regulatory timetable) that 'not having developed a sufficiently mature understanding of the scope of work necessary' Heathrow's costs have escalated significantly. We cynically question whether this reflects previous masking of true costs early in the schemes development, possibly to minimise and limit opposition.

Nuance

The NPS expects that Heathrow should demonstrate "that its scheme is cost-effective and sustainable". Heathrow's current masterplan, estimate at £32.5 billion, remains in a state of flux as demonstrated by its DCO costs requirements, having increased by 89% to over £500 million.

Division

Costs

Need for Cost-Effective Terminal Components

Action

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

Title

Heathrow's monopoly needs market competition. Expansion plans (particularly terminals) are not sufficiently cost-effective nor sustainable

Topical Issue

In funding terms, the NPS principally focuses on Heathrow being able to show that there are no financial impediments to the scheme proceeding, based on the expansion plans being sufficiently cost-effective nor sustainable except they are not.

Evidence

In the context of the need for genuine competition at the airport, the aspirations of Heathrow to submit a £32.5 billion DCO masterplan application that would take three decades to deliver terminal capacity should not be more favourably supported than the alternative 'plug in and play' Arora Heathrow West terminal design that is more commercially driven, cost efficient and operationally effective.

There is an inherent risk that Heathrow's early Category C £2.4 billion costs (a 220% mark-up on previous estimates) could distort competition by being spent on areas that are unnecessary for the ultimately consented and built scheme. Heathrow's track-record should be a cause for concern and minimising risk of expenditure that might ultimately be wasted is an imperative.

Heathrow's 'threat' that the artificial target of 2026 for the opening of the new runway would be delayed without it retaining its monopoly is not in anyone's interest bar its own shareholders. That prospect of a delay in expansion should be a perfectly acceptable scenario that would give Heathrow a clear message to stop escalating costs and genuinely work collaboratively for UK plc interests. It would also provide sufficient headroom to invest in public transport and modal shift provision ahead of the operational commissioning of the third runway.

Nuance

The NPS specifically avoids identifying any statutory undertaker to carry out the preferred scheme. Moreover, the NPS reiterates the option for different components - such as the terminal(s) - to be dealt with by different parties. In order to demonstrate NPS requirements that the "scheme is cost-effective and sustainable", Heathrow's current masterplan must be fully open to differing parties delivering more cost effective components and dramatically reducing the estimate £32.5 billion expansion plans.

Division

Costs

No Public Subsidy

Action

Heathrow must ensure that the expansion is genuinely at no cost to the British taxpayer.

Title

No public subsidy for Heathrow's Expansion.

Topical Issue

Contrary to assertions made by the Prime Minister, the Secretary of State for Transport and Heathrow's own Chief Executive, the expansion is far from being advanced at "no cost to the British taxpayer". Spelthorne residents are currently facing offsetting a significant proportion of non-statutory cost for dealing with the expansion as well as covering the cost of any enforcement arising from constructing the airports expansion. Along with all UK taxpayers, Spelthorne residents will also be contributing to wider public transport costs and off-setting increased health impact costs.

Evidence

Heathrow's Expansion is an extraordinary scheme of national importance and that is why Spelthorne has a dedicated Heathrow expansion team working on robustly scrutinising emerging expansion proposals. However, our scrutiny costs are not insignificant and Spelthorne does not want taxpayers to subsidise Heathrow's expansion process. Whilst Spelthorne has secured circa £150k from Heathrow (both directly and indirectly), there remains a considerable deficit.

Additionally, *all* the checks and balances relating to expansion, such as environmental enforcement, should be funded by Heathrow without recourse to local taxpayers or impinging community services. Moreover, strategically the Council believes that necessary public transport investment for the airports future sustainable expansion should be made by Heathrow Airport itself and not further burden taxpayers.

Critically, the health of the community should be put first when considering Heathrow's expansion since adverse environmental effects fall disproportionately on the vulnerable, particularly children and older people. The Council subscribes to the "polluter pays" principle; the commonly accepted practice whereby those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment. Seemingly, there has been a reluctance to protect the health of the population or the taxpayer in the face of Heathrow's commercial ambitions.

Nuance

The relationship between cost and affordability for expansion is governed by the regulated funding of the airport and funding from other sources. Whilst funding in the NPS principally focuses on Heathrow being able to show that there are no financial impediments to the scheme proceeding, the policy also expects that "the applicant should demonstrate in its application for development consent that its scheme is cost-effective and sustainable". Spelthorne currently views the expansion as unsustainable and not cost-effective and is concerned regarding the local and national tax-burden cost it generates for UK taxpayers, primarily to support international shareholders.

Division

Costs

Compensation

DRAFT

Need for Genuine “World Class” Compensation

Action

Heathrow to propose and deliver genuine ‘World Class’ compensation for Spelthorne’s communities.

Title

‘World Class’ Compensation?

Topical Issue

There is scant recognition for the cumulative impact the expansion plans would have upon local communities and the explicit need for suitable localised compensation. The scope of insulation works offered by Heathrow to noise-affected residents are in general terms lower than international comparators. The structure and functionality of the proposed compensation packages, building on the opaque and unfit-for-purpose existing packages and processes, need to be properly re-structured to enhance their acceptability.

Evidence

Irrespective of mitigation measures, local people will be significantly affected by the design of the current expansion plan. The Government accepted the Airport Commission’s report recommending that a ‘world class’ compensation package for local residents was required. This compensation package should address, for example, impacts on property values, noise and accumulative expansion impacts to ensure that local residents are *both* properly compensated *and* share the economic benefit of expansion.

To be ‘world class’ requires benchmarking the compensation packages offered by Heathrow with airports outside of the UK. International airports mitigate the impacts of their operations on local residents, with the most successful tailoring their offer to the specific circumstances of the airport impact upon surrounding communities. The combination of compensation and mitigation ‘volunteered’ by Heathrow for communities in Stanwell Moor and Stanwell Village fall short of the ‘world class’ claim, particularly as the reach of the airport functionality significantly impacts upon the well-being of communities in those villages.

In October 2018, the World Health Organisation published its new guidelines for environmental noise [*Environmental Noise Guidelines for the European Region (2018)*]. They include tough new lower thresholds set for aviation noise, reflecting the growing body of evidence about the harmful effects of noise on health. Yet these community health impact thresholds are ignored by Heathrow.

Nuance

The scope of insulation works offered by Heathrow Airport to noise-affected residents are in general terms lower than international comparators. The current proposals from Heathrow indicate that the full costs of works would be funded for only the worst affected properties, notably those properties within the 60dB Leq contour. However, to be a genuine ‘world leading’ offer, the lower contour of 55Ldn within which properties would qualify is consistent with other international comparable airports.

Spelthorne’s concerns highlight the need to structure the package to address local concerns through meaningful public engagement rather than simply impose a programme that has already been shown to have significant shortcomings.

Division
Compensation

DRAFT

Where's the Gain?

Action

There are insufficient positive proposals made by the Heathrow expansion to provide new, improved or compensatory land or facilities. Spelthorne requires the following:

- 1) Direct replacement of facilities lost
- 2) Compensatory provision for facilities (including open space generally) which is degraded by the scheme
- 3) Community compensation to make up for the general impacts of the scheme

Title

Heathrow's expansion provides insufficient positive proposals for Spelthorne communities.

Topical Issue

The current consultation has now given a clearer idea of the seismic impact that expanding Heathrow will have on Spelthorne, its communities, businesses and environment. As Spelthorne considers the impacts of expansion to the Borough, it is still left to ponder what benefits Spelthorne will directly accrue from the scheme.

Evidence

In simple terms, the land use proposals for the Borough indicate that Spelthorne can expect one of the UK's largest car park ever built, associated additional induced traffic and dirty water treatment works. Spelthorne will also be faced with the prospect of construction traffic (including circa 42% of construction HGVs by 2025), noise and other impacts for the duration of the development over the coming decades.

For an additional handful of years, flights (ATMs) will increase by circa 25,000 in advance of the third runway, intensifying the impact on our communities in Stanwell Moor and Stanwell Village (as well as across the Borough due to the Compton Route utilisation).

In response, Spelthorne has been told that:

- 1) residents and businesses will benefit from the rapid transit system from the Parkway into the central terminal area. However, this will serve to attract passengers and colleagues to park on Stanwell's local roads, for which we have not yet had assurance that Heathrow will take the necessary steps to prevent this.
- 2) an as-yet unquantifiable number of locals could hypothetically benefit from additional jobs/apprenticeships.

Nuance

The ANPS makes reference to a community compensation package, statutory blight, and re-provision of open space, which are addressed by Heathrow in the AEC to varying degrees. These references are in regard to specific impacts and would be required of any major scheme in an attempt to 'neutralise' the harm. Spelthorne considers that there should be tangible gain accruing from the expansion that can be demonstrated to local communities, over and above compensation.

Division

Compensation

Need to Compensate for Loss of Green Space and Recreation Facilities

Action

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.

Title

Adequate compensation to communities for loss of green space and recreation facilities.

Topical Issue

Large areas of open space (current and future) and amenity areas will be lost to make way for the new expanded airport. A number of sites which were created for communities following the development of Terminal 5 are now affected by Heathrow's expansion plans to build a third runway, terminal buildings and new and realigned roads, including the M25.

Evidence

Heathrow has pledged to compensate for loss of green space with enhanced areas of open space and a 'green loop' around the airport. This would include linked pedestrian paths, cycleways and areas for nature conservation. However, Spelthorne is concerned that in many places the "loop" is very narrow and will need to be significantly widened to be effective. Even then it has not yet been demonstrated that this will adequately compensate for the large swathes of open space that would be lost, much of which is publicly accessible and important for wildlife, such as the Oaks Road Biodiversity Site created as part of the T5 mitigation.

Some areas proposed for enhanced green infrastructure as compensation for the loss of Green Belt and other open space largely comprise land which is already due to be restored to green open space with public access once the current minerals and waste activities cease, in particular, land at Hithermoor and at Stanwell Place. Heathrow needs to demonstrate that its proposals not only deliver these schemes at an early stage but properly provide additional benefits as compensation for other losses.

Spelthorne is therefore strongly advocating that, as an absolute minimum, usable open space that genuinely serves the communities of Stanwell and Stanwell Moor should be in locations where the benefits can be provided as soon as possible and not be dependent on the completion of works in the latter stages of construction.

Having regard to the NPS para 5.113, Spelthorne has commissioned a leisure study for the Stanwell area to explore the most appropriate options available to Heathrow to fully compensate for the loss of green open space and other recreational activities. The re-provision of green space lost to the expansion must be equivalent to, or over and above the quantum lost in terms of quality and quantity. Current plans fall significantly short of adequate compensation.

Nuance

The NPS requires that "existing open space, sports and recreational buildings and land should not be developed unless the land is no longer needed or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location" (NPS para 5.112)

Division
Compensation

DRAFT

Need to Expand Wider Property Offer Zone to Cover Communities

Action

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).

Theme/Topic/Title

WPOZ should be expanded to cover the whole of Stanwell Moor and large parts of Stanwell.

Topical Issue

Spelthorne is particularly concerned that, under the current proposals, no Spelthorne residents will benefit from the package of measures known as the "Wider Property Offer Zone". These measures include residents being able to sell their homes at the market value of the property "as if expansion had never been promised or taken place" plus a 25 percent uplift.

Evidence

Excluding south of the airport from the WPOZ suggests that Heathrow has come to the conclusion that Spelthorne communities will not be *newly impacted* by expansion. That assumption is simply wrong. Communities will be *newly impacted* by:

- airport development brought far closer to homes, families and schools
- construction, bringing enormous disruption to the local area
- more flights, both before and after expansion, with associated noise and air quality challenges
- more traffic coming on to local roads due to planned reconfiguration of routes
- more airline passengers parking in local roads to avoid airport parking costs
- more taxi and private hire vehicles waiting in residential roads with associated littering and annoyance to local residents
- loss of valued open space, both existing and what would have been delivered through restored mineral sites
- ecological impact on Staines Moor
- loss of community spirit
- effect on property prices and being able to sell their homes

Nuance

As per Spelthorne's response to CON 1 (Jan 2018), both Stanwell Moor and Stanwell will be *newly impacted* by the expansion of Heathrow and therefore the WPOZ must, as a result, include both those communities. In respect of compensation for off-site owners, the statutory compensation for nuisance (and other actionable harm) caused by construction works (CPA 1965 s10) and devaluation due to the use of public works also includes aerodrome and any highway effects.

Division

Compensation

Need to Deliver on Promises given to Local Communities

Action

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.

In line with Frankfurt, Heathrow must put in place an extensive proactive public engagement programme to ensure that locally affected communities actively shape the structure of the compensation and mitigation package.

Heathrow must also put forward a compensation scheme which more accurately reflects the impacts on communities by adopting a similar approach to HS2.

Title

Stop backtracking and deliver appropriate compensation

Topical Issue

Communities will be newly impacted by an expanded airport and the 'associated infrastructure' required to deliver the new northwest runway (See WPOZ sheet for more detail). Communities will be affected and Heathrow has seemingly reneged on assurances to local residents that they would be part of the WPOZ.

Evidence

Heathrow has (at public and other meetings) advised the local community in Stanwell Moor in particular that they would be included within the WPOZ.

(See WPOZ sheet for more detail on how the communities are newly impacted)

Nuance

The ANPS states "The Secretary of State recognises that, in addition to providing economic growth and employment opportunities, airport expansion will also have negative impacts upon local communities... The Secretary of State expects the applicant to provide an appropriate community compensation package".

The HS2 scheme has a series of Homeowner Payment Zones and Extended Homeowner Protection Zones (and the distance from the expanded airport has to be commensurate with the impact that the expansion will have). The HS2 compensation scheme allows residents in the Homeowner Payment Scheme to claim between £7,500 and £22,000 depending in the distance from the rail line. Within the rural support zone you can receive a cash lump sum of up to 10% of the value of your home (£30 – 100k) or the Government will voluntary buy your house at its market value.

Division

Compensation

A New Environmental Accord

Action

A new Environmental Accord with Heathrow Airport that will enhance our natural environment and offsets Borough-wide 'safeguarding' impacts.

Title

A new Environmental Accord with Heathrow Airport

Topical Issue

Heathrow's safeguarding requirements, however necessary, impinge on the built and natural environment of this Borough through its planning control. Safeguarding requirements for Heathrow Airport includes an area that encompasses all of Spelthorne.

Evidence

Whilst we're all too familiar with the 'safeguarding limitations' imposed by Heathrow Airport on the height / design of developments across the Borough to prevent radar interference and bird nesting, which in some cases suppress sustainable density developments, the operations of Heathrow are also significantly felt in our natural environment.

Despite having some of the largest reservoir waterbodies in the UK as well as 12 miles of River Thames frontage, recreational activities (such as fishing or shoreline footpaths that attract the public to feed birds) have been banned in a number of areas due to Heathrow Airport's objections. The Airport's overriding objective is to prevent any activities that attract flocking birds such as swans and geese from areas of standing water in nature reserves, lakes, ponds, etc.

Whilst the Borough supports the safeguarding process, we nevertheless are not compensated for the economic and environmental costs that Heathrow's 'designing out bird hazards and controlling development' imposes upon our economy and the quality of our natural environment.

Nuance

The NPS sets out some general expectation that potential adverse impacts will be considered along with any measures to avoid, reduce or compensate for them. It is in recognition of Heathrow's safeguarding impact that we seek a wider Environmental Accord.

Detail/Division

Compensation

Engagement

DRAFT

Inaccessible and Incomplete Documentation

Action

Spelthorne requires Heathrow to engage with communities in a transparent way.

Title

Inaccessible and incomplete documentation

Topical Issue

Spelthorne remain concerned about the inaccessibility and incompleteness of the documentation. The documents are very technical in language and approach, difficult if not impossible to download, and the implications to individuals are not transparent as key information is absent.

Evidence

Heathrow's approach to the consultation has not been transparent and as result Spelthorne has requested that Heathrow improve the information that they communicate to residents. Heathrow needs to publicise the documents, policies and information they have so that our communities can be engaged in an informed way.

The documents regarding CON2 as presented are inaccessible. They are mainly available on line, which means that may residents cannot access them. There are outreach events but at these, a very positive spin is given. Attending a location to view a mountain of complex documentation poses an unnecessary challenge to our residents who are not familiar with the terminology used. Terms such as "concluding significance" mean absolutely nothing to residents. Our residents are struggling to establish what the proposals means to them. They cannot accurately establish how the proposals will affect them directly which in turn means that they are not able to effectively engage.

As a result of this lack of clarity Spelthorne, and at considerable effort, has undertaken to brief councillors, residents associations and residents via leaflets (approximately 7,000) and presentations to help them navigate and understand the proposals.

Nuance

Feedback from residents shows a lack of understanding regarding the proposals.

Residents cannot access the large documents online by phone and need a computer in order to access them but even then they often 'crash' a computer. The documents are structured in such a way that it is difficult to find a topic of interest and even the search bar struggles. The online version talks through set consultation questions and stifles open dialogue and comments.

The feedback forms given at the events are drafted in a structured way asking about the mitigation Heathrow are proposing rather than giving information about the direct effect on each community.

As an example the information regarding night flights, of considerable interest to communities affected, is presented in a confusing way suggesting that the situation in the future would be better. This is at best misleading. It is represented in a complicated way that disengages most people.

Division

Engagement

Need for a More Open Engagement Strategy

Action

Spelthorne urge Heathrow to have a more open engagement strategy.

Title

Engagement – Leading questions and steered responses

Topical Issue

The feedback questionnaire and the website steers respondents to answer specific questions that divert attention. This is not an open engagement but a steered consultation.

Evidence

Spelthorne is concerned regarding the approach to consultation. The graphics and key messages are all very positive and make very little mention of any adverse impacts. The feedback questionnaire steers participants to complete set questions regarding mitigation rather than talk about their current experience or their concerns for the future. For example, the feedback questionnaire focuses attention elsewhere and for example when looking at runway alternation the question focuses on whether this should occur at 2pm or 3pm. Residents have been asked what they think of the design of the Southern Parkway rather than if they want a parkway on their doorsteps.

The online consultation is particularly onerous and complex. If the computer does not crash, it takes you through complex information before asking the consultee what they think of the mitigation or how they plan to improve things. It does not for instance say what you think about 1,400 HGV movements per day. What do you think of 22,000 construction workers travelling to the airport, many of which will be travelling through your neighbourhood? It does not talk about the noise and disruption from the construction nor does it talk about the congestion as a result of the moving of the M25, the A4 and the Southern Perimeter Road.

Spelthorne remains concerned and has repeatedly raised concern regarding the lack of transparent and meaningful engagement with our communities.

Nuance

Officers from Spelthorne have repeatedly raised concern about the consultation only being available electronically or at a number of events – only three are within the Borough.

The revised NPS has a number of relevant paragraphs. 5.252 states: 'communities will wish to participate fully in the development and delivery of expansion, and the Government expects them to be able to do so'. 5.242 states: 'People are entitled to know what steps will be taken to help protect them.....where appropriate help them move house'.

The feedback questionnaire includes questions worded:

'3. Please tell us what you think of our boundary design proposals to manage noise and the effects on views....'

'4. Please tell us what you think about our development proposals and the measures proposed to reduce effects in these areas.'

Division

Engagement

Be Honest with the Affected People

Action

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.

Title

Be honest with the affected people.

Topical Issue

Without open and meaningful consultation, our communities continue to be kept in the dark. From Spelthorne's own engagement with local communities, it is clear that they have not been aware of scale of impact the expansion would have. There have been significant shortcomings engaging in effective and meaningful dialogue with all key stakeholders.

Evidence

Heathrow's 'targeted community engagement' events have barely referenced construction, and where they did, it purely related to the 3rd runway and not the airport's physical expansion. The portrayal of schematic 'cartoon' drawings and cross-sections misrepresented the massing and scale of what parking might be built. Along with various other 'engagement' shortcomings, Spelthorne (yet again) finds itself in the position of having to urge Heathrow, on behalf of our communities, to be more transparent with them about the potential impacts that could change the area close to their homes beyond recognition.

Nuance

Feedback we had from those who attended the various workshops was that the expansion impacts were not discussed. We can appreciate the reasons for Heathrow wanting to show the expansion proposals in a positive light when consulting with the public, and we do not deny that they could experience community benefits from your plans, but we do not consider that it has been expressed clearly enough that these benefits come at a price and are mitigation for the significant impacts that expansion will cause.

Lack of proper engagement (not giving real choice and options) - Significant shortfalls in Community PEIR

Division

Engagement

Shortfall in Preliminary Environmental Impact Report (PEIR)

Action

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.

Title

Significant shortfall in the PEIR.

Topical Issue

The approach of Heathrow regarding consultation is woefully inadequate and has not included significant sections of the community.

Evidence

Heathrow's documentation is complex and difficult to understand which means that any inspection of the documents is meaningless as they are extremely technical in approach and language. No specific community-by-community impact has been conducted. Furthermore, no effort has been made to learn from CON 1 or take on board the concerns of Spelthorne who have repeatedly expressed concern regarding the engagement proposals. The community PEIR remains incomplete despite being of fundamental importance and despite CON2 being near completion.

Residents and our wider community and being kept in the dark and not being told the full story of how they will be impacted. The lack of key documentation regarding the policies and procedures that will effect these key communities means that they are not fully informed.

Nuance

The Statement of Community Consultation has not been followed.

The legal duty to consult as detailed on page 9 includes 'local communities in the vicinity of the project'. However, the vicinity of the project is much wider and there are many newly impacted communities not currently being consulted.

Under 3.1.7: 'extending to those within the area in which noise effects from overflying aircraft...'. This means that those not currently experiencing noise from being overflown are not targeted. This lack of engagement will result in those not currently overflown not understanding that they may become overflown in the future. Focusing on only those that currently experience noise, as opposed to those that might, will give a skewed response and deny those who might be affected from understanding their fate. Depriving them of an opportunity to voice their view.

Under 3.1.9: as regards documentation – 'for inspection by the public in a convenient manner'. Spelthorne will argue that this has not occurred and the documentation is not in a convenient manner and is very difficult to understand and digest and runs to thousands of pages.

3.2.2: Heathrow will 'consult on the PEIR and will be seeking the local community's views on the information contained in it through the approaches set out in section 4 of this document.

Section 4 states that it will: 'raise awareness of the Project and provide the local community and other stakeholders with the opportunity to understand, comment and influence the proposals.

Spelthorne would strongly suggest that this has not occurred. Their communities have only been given a positive view of the expansion and have been given little or no information regarding key aspects of the scheme to be able to fully engage having understand how they will be affected. The key gaps in the lack of documentation include:

- A surface access strategy is yet to be completed.
- A workers accommodation strategy is yet to be completed.
- A compensation fund detail is yet to be completed.
- The detail of the construction phase is yet to be set out.

Under 4.1.2. Heathrow has undertaken to 'provide clarity on what is and is not part of the project'.

Spelthorne would state that this has not occurred. The proposals are still being worked through and locations of key aspects of the scheme are not yet known. Such as:

- Logistics hubs.
- Workers accommodation sites.
- The traffic movement through the local areas.
- The recruitment of the workforce.

Spelthorne concludes that there is a lack of clarity regarding the project and what is in and what is out.

Under 4.1.7 of the Statement of Community Consultation Heathrow states that they will consult on their preferred masterplan but they are unable to do so as key aspects are not yet developed.

In terms of engaging with vulnerable groups, those with protected characteristics and those in deprived areas, Heathrow has failed completely in this regard.

Notwithstanding Spelthorne providing Heathrow with detailed information and databases and referred them to information sources, Heathrow has failed to effectively engage with those that are most vulnerable. Their event in Stanwell aimed at those representing vulnerable people was only attended by 9 people, 7 of which were local to the borough. In Berkshire, a similar event attracted 9 people. The number of Heathrow staff outweighed those attending.

Heathrow cannot accurately say that they have engaged with those that are vulnerable. The documents have not been available in braille or other languages or even in a digestible manner for ordinary folk. The consultation is flawed and has been inaccessible from the start, meaning that Spelthorne and other local authorities have had to invest time and effort in trying to assist their communities in understanding the implications.

It is particularly disappointing as 4.3.7 states that the results from CON1 were assessed to assist in further clarification of what measures are needed. Despite this analysis there appears to be no specific effort made or further measures employed to engage with these seldom heard and or vulnerable groups of people.

Division

Engagement

Community

DRAFT

Need to Develop the Community Compensation Fund

Action

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.

Title

Community Compensation Fund is not fully developed.

Topical Issue

Spelthorne remain concerned about the infancy of the Community Compensation Fund, and the suggested inclusion of mitigation within it. Spelthorne would like it to be finalised as a matter of urgency so that communities can be aware of the choices and compensation that are available to them for the undoubtedly negative impact they will endure.

Evidence

Spelthorne remains concerned that their communities are faced with significant and detrimental impacts as a direct result of the proposed expansion to Heathrow but will not be aware of the compensation or mitigation that is proposed.

Spelthorne is of the view that communities should be protected from any adverse impacts from third parties. Spelthorne would strongly protect the right of these communities to have a right to have a choice about where to live. Any policies or procedures that are introduced by Heathrow because of the proposed expansion and associated works should afford these affected communities with the option to move or receive appropriate compensation. Any community compensation fund should be flexible and comprehensive enough to enable that full and informed choice.

Withholding information regarding compensation will mean that residents are commenting blind to the full effect and mitigation available to them.

Some of the PEIR sections are still incomplete. Their significance remains to be concluded in relation to the socio economics and employment PEIR and The Community Compensation Fund PEIR. It also appears that further work is required to identify vulnerable communities and the effect that the proposed expansion might have on them.

Nuance

In 5.237 of the revised NPS it states that there will be impacts on air quality, noise and annoyance which in turn will impact on health and cognitive development.

5.242 People are entitled to know what steps will be taken to help protect them.....where appropriate help them move house.

5.248 – Consult on the detail of a community compensation Fund

At the Socio economic PEIR feedback, it was made clear that not all the affects have been concluded because the significance is not yet known.

Division

Community

Need to Consider the Knock-On Effects

Action

Spelthorne asks that Heathrow considers not only the direct effects of the proposed expansion but also the indirect or 'knock-on effects'

Title

Knock-on effects not considered.

Topical Issue

Heathrow's approach has been to consider each PEIR independently. The results of this is that the cumulative effects of each aspect are not considered.

Evidence

In terms of the construction phase, as an example, Heathrow has informed key stakeholders that up to 14,000 workers will be recruited. Heathrow is of the opinion that these 14,000 will mostly come from the local labour market but this is highly questionable and lacks evidence. If it is true that this number of workers can be locally sourced, it will most certainly affect the availability of local labour force for current businesses. This in turn will result in the costs of labour putting pressure on the financial sustainability of local small businesses that really on unskilled workforce.

Another example is the effect of introducing a low emissions zone that may result in the displacement of more polluting vehicles into neighbouring streets. This was evidenced when the Congestion Zone was introduced in London where parking issues were increased just outside the zone. Apps for mobile phones appeared to provide routes avoiding the Congestion Zone.

The need to house construction workers locally may result in more HMOs, official or otherwise, driving up the affordability of property and in turn placing a burden on local infrastructure such as schools, public transport and health services. In the PEIR the numbers of people did not equate to the number of properties so this demonstrates clearly that the official view is that multiple workers will occupy single properties.

During the PEIR it was raised that lessons could be learnt from HS2 where the compensation fund considered and compensated business that might lose out as a result of the works. These lessons have not been considered by Heathrow.

At the Major Accidents and disasters PEIR clarification on 5th June, it was admitted that Heathrow's own emergency service will not be extended to cover any of the proposed construction work. However, the burden that would in turn place on current emergency services has not been considered or factored in. No risk management has been undertaken.

Nuance

In the Socio Economic PEIR the displacement effects of the labour workforce and potential to drive up labour costs and threatening financial sustainability of SMEs were not considered. There was significant criticism regarding the lack of crossover information and consideration of cumulative effects.

The knock on effects of house prices have not been considered. Nor have the effects of parking in local roads to avoid a low emission zone have not been considered.

The Oxford Economics model did not consider market value when looking at effects of the expansion. This is a major flaw.

Division

Community

DRAFT

The Most Deprived Area is the Worst Affected

Action

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.

Title

The most deprived area is the worst affected

Topical Issue

Stanwell Village and Stanwell Moor have already suffered significant and continual detrimental impact and blight on their homes as a direct result of the current operation of Heathrow, they should not have to bear the burden of further expansion.

Evidence

The burden that Stanwell will face will be substantially increased by:

- The Southern Parkway creating parking for approximately 22,000 cars - the Parkway appears not to be hard wired. This poses the risk of not only significant increased noise and air pollution but also congestion with drivers cutting through Stanwell to reach it. It may also create additional parking issues for the residents who live adjacent to the Parkway as drivers may try to park locally avoiding the charge but using the free shuttle buses. This has not been properly assessed or considered.
- Congestion generally will increase for Stanwell Moor and Village due to the proposed alterations to key roads and rivers and the necessary diversions will create a rat run for these residents. This will be further increased by the proposed introduction of a low emissions zone around Heathrow which is extremely likely to displace cars, especially those who are the most polluting, onto adjacent areas and in particular Stanwell Village and Moor.
- Stanwell Moor in particular has, for a number of years, experienced antisocial behaviour as a direct result of the airport by taxi drivers – ordinarily out of town, parking in their streets waiting for taxi fares. The local residential streets do not have the necessary infrastructure and the taxi drivers are using the front gardens of resident's properties as toilets. SBC remain appalled by this and urge Heathrow to immediately address this situation.
- One of the proposals included the introduction of an HGV petrol station in the village. If this were to be introduced it would increase the amount of HGV's in the area and will increase the pollution. A recent meeting with Heathrow has identified the potential for there to be 1,400 HGV movements per day. This would cause unacceptable noise and air pollution and increased traffic congestion for our most vulnerable residents.

Nuance

Despite Spelthorne continuing to request that the WPOZ be extended into Stanwell Moor and adjacent areas this has not been agreed to within the property proposals as part of the current consultation. This has resulted in a lack of choice for those most affected and most vulnerable.

At the PEIR clarification assumptions had clearly been made such as the preliminary effect of the construction workforce 'assumed to be minimal'.

The NPS states under 5.8 that 'the Applicant must prepare an airport surface access strategy.

And under 5.5 that 'access to the airport should 'minimise congestion and environmental impacts'.

Division

Community

DRAFT

Spelthorne's 13 Communities Will Be Affected

Action

Spelthorne asks that Heathrow prepare and conduct a detailed impact analysis for each of our communities, which has yet to be completed.

Title

Spelthorne has 13 communities that will be affected.

Topical Issue

It is essential that each of our communities has accurate, complete and understandable information regarding the direct and indirect effects of the proposed expansion on them.

Evidence

Some of our affected communities have had a more detailed assessment but not all and only Stanwell has within the borough of Spelthorne. Given that the expansion will have a wider effect on adjacent areas, we ask that a more detailed impact assessment is conducted on every community that is affected within Spelthorne. The lack of information for each area affected results in that community being consulted blindly. If they remain unaware of how they will be affected they cannot fully and knowingly engage and give an informed view.

Nuance

Despite the AEC being launched, key documents remain in their infancy or lacking conclusion of significance. This means that the true impact on our communities has not been made clear to them. In the absence of this clarity, each community may respond to the consultation blindly or after being misled as to the true implication and effect on them.

There are a number of large gaps:

- A surface access strategy is yet to be completed.
- A workers accommodation strategy is yet to be completed.
- A compensation fund detail is yet to be completed.
- The detail of the construction phase is yet to be detailed.

In the Statement of Community Consultation under point 4 Heathrow undertake to:

'Raise awareness of the Project and provide the local community and other stakeholders with the opportunity to understand, comment on and influence the proposals.'

In Heathrow's statement of community consultation, they state under 4.12 that a key objective is:

'Raise awareness of the project and provide the local community and other stakeholders with the opportunity to understand, comment on and influence the proposals.'

This has not been achieved as there remains significant gaps in key information as detailed above.

Division

Community

Shortfalls in Community PEIR

Action

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.

Title

Significant shortfalls in Community PIER

Topical Issue

The expansion of Heathrow, as well as associated airspace changes, will fundamentally affect not just Stanwell Moor and Stanwell, but also communities throughout the Borough. We have constantly reiterated our concerns to Heathrow about how our communities are being engaged (from CON 1, the recent airspace change consultation, through to the supposed more detailed 'engagement' with our northernmost communities late last year).

Evidence

The effects of the airport are wide and far and the consultation should include a wider catchment area.

It must include those that are affected by noise from the flight paths, those who may experience air quality issues, or who might be affected by congestion, and other effects of the construction phase and ongoing operations at Heathrow.

Spelthorne remains concerned that despite raising what are seen as fundamental flaws in the engagement process, these concerns do not appear to be filtering through, or altering Heathrow's strategy or approach.

Nuance

As a Council, Spelthorne formally maintains that the short preparation time that Heathrow has allocated to plan and conduct a full and detailed consultation with Spelthorne's community falls short of expectations.

The approach on compartmentalising different parts of the process does not allow our communities to fully appreciate the true and full picture.

In Heathrow's statement of community consultation under 4.3.7 Heathrow states:

'In addition, our assessment of participation during Con1.....has assisted in further clarifying the nature of these seldom heard groups and the measures which are needed to encourage their participation in further consultation.'

The above has not been completed and the documents remain inaccessible and directed to those in a small geographic area, with English as a first language and the technical knowledge to wade through the complex information.

Division

Community

Impacts of the Expanded Heathrow on Protected Characteristics

Action

To consider the wider impacts on local communities especially those with protected characteristics and address issues that are sensitive to the evolving LGBT+ community

Title

Equality and Diversity - effective planning to address protected characteristics in the community with an expanded airport.

Topical Issue

The equality and diversity report covers a range of issues but does not cover sufficiently impacts of ancillary development, e.g. parking, on communities on those with protected characteristics, especially those to the south of the airport. In terms of construction the report considers potential impacts on women from a male dominated construction workforce but does not recognise there could be prejudice to the LGBT community. Insufficient engagement has taken place with hard to reach communities to really understand the needs of those with protected characteristics and ensure the effects of an expanded airport are fully mitigated for those falling into the relevant categories.

Evidence

There is still a considerable amount of work to be done in detail on the relevant communities' composition and identifying those with protected characteristics under the Equality Act to ensure appropriate mitigation measures can be put in place. However, covering the issue effectively also requires a clear geographic assessment by Heathrow of the area to be covered in assessing the equalities issue as the impacts will be felt well outside the airport boundary. It is not evident that wider construction impacts or the impacts of, for example, rail connections are being considered, especially on communities affected by ancillary, but necessary, developments for the project on the southern boundary. This could lead to cumulative impacts which have greatest effect on those with protected characteristics, especially the young and old and these are not fully covered. Although during construction the impact on women by a male dominated workforce is considered, the potential impact on the LGBTQ+ community is dismissed but there could be inherent bias towards that community by the construction workforce.

Given the socio-economic impacts of the project these issues need to be considered in conjunction with equality issues for deprived communities and those with protected characteristics.

Nuance

Spelthorne's concerns highlight the need to fully address the effect on persons or group of persons who share certain characteristics protected by the Equality Act 2010.

Division

Community

Noise and Health

DRAFT

Construction Noise and CoPA s61 Consents

Action

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.

Heathrow's generalised intention to work 24/7/365 must be reviewed for the protection of residents.

Title

Construction activity and The Code of Construction Practice

Topical Issue

- Proposed 24 hour construction work
- Study area for noise effects only 300m from construction activity rather than 1km which is more appropriate for low frequency noise.
- Residents will experience sleep disturbance and impaired cognitive development (particularly in children), and other negative noise related health outcomes
- Increased costs to Spelthorne Council with managing the next 10 years+ of related statutory duty (i.e. CoPA s61 applications, noise complaints etc.).
- Proposal for a specifically constituted body provided for by the DCO, referred to as the Joint Planning Committee (JPC) to manage section 61 consents.

Evidence

The construction phase will mean extended periods of noisy activity that will cause significant disturbance to residences and communities. Heathrow has put forward a wide range of activities for which they plan construction works to be carried out over 24 hour days, 7 day a week working (including public holidays). Heathrow has provided little information on where they will not reserve the right to work 24/7. These general provisions for 24/7/365 hours of work are not acceptable and are highly likely to be harmful to the health of residents due to night time disturbance and without daytime respite. As such it is essential that the Section 61 consents procedures is suitable and sufficient to ensure the control of work hours and noise emissions for resident's protection.

Heathrow are proposing to use the DCO process to amend the CoP'74 provisions and establish a set of Heathrow specific parameters which must be adhered to when deciding upon CoP'74 section 61 consents, which will be through a Joint Planning Committee established by the DCO. In considering the conditions to be applied to any section 61 consent and the application of BPM principles, the decision maker will be required to accord with the working hour's proposals which will be put forward in the CoCP at DCO application. The LA in whose area the work covered by s.61 is to be carried out can make representations to the JPC.

No details relating to Heathrow's proposed 'parameters' for the replacement of CoPA section 61 been submitted at part of this PEIR. This information must be submitted to all stakeholders and the public for full consultation prior to submission of the ES.

It is essential that residents retain confidence in the local authority system to ensure they do not suffer from negative noise related health outcomes resulting from the construction works at Heathrow; particularly important given the longevity of the construction works.

Nuance

Control of Pollution Act 1974

Division

Noise and Health

DRAFT

Early Growth of Heathrow Air Traffic Movements

Action

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).

Title

Early growth of Heathrow Air (+25,000 ATM)

Topical Issue

Heathrow will request an early release of 25,000 ATMs per year to be made available once structural alterations have been made to facilitate the additional ATMs. This would be prior to the implementation of noise mitigation measures and is therefore likely to cause additional disturbance to residences and communities without sufficient time to appropriately identify and implement noise mitigation to properties in advance of the introduction of noise.

Evidence

Spelthorne opposes early growth prior to the third runway being operational. Heathrow's analysis of with and without early growth (+ 5.2% ATMs) has determined that there will be small increase in noise (0.2 dB) resulting from the increased number of flights.

During the day an additional 40,300 people will be affected at noise levels above LOAEL (1,051,100 rising to 1,091,400), and an additional 3,300 people will be affected at noise levels above SOAEL (51,150 rising to 54,450). During the night an additional an additional 2,000 people will be affected at noise levels above LOAEL (664,900 rising to 666,900), and an additional 300 people will be affected at noise levels above SOAEL (54,000 rising to 54,300). The locations of affected residences has not been provided, this information must be provided as part of the ES. From the figures provided the effects within Spelthorne have been estimated.

Further, for the daytime, departures on the Detling SID (westerly) and Compton SID (easterly) extend the noise contour into central and southern parts of the borough of Spelthorne. In both cases, it is expected that a small number of properties will be encapsulated by the slight expansion of the LOAEL and SOAEL contours caused by the above mentioned increase in average noise levels, however, these cannot be identified without an accurate comparison of 'with development' and 'without development' contours being plotted.

This information must be made available before the submission of the detailed ES. Certainly an accurate evaluation of the affected properties will form an important part of the assessment to ensure that mitigation (in the form of noise insulation) is properly allocated to those residences that require it.

Nuance

The Airports NPS makes clear that it expects Heathrow to bring forward appropriate compensation to control and reduce noise impacts, which will include noise insulation programmes. Further the ANPS states that "the applicant must fulfil its statutory duties in a timely and efficient manner".

Division

Noise and Health

Early Growth and Compton Route

Action

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.

Title

Redesign of the Compton Route to resolve high levels of aircraft noise in Ashford and Sunbury.

Topical Issue

It is highly likely that early growth (+25,000 ATMs/year) will result in significantly more disturbance to residence if the Compton Route is not adequately redesigned to prevent excessive noise disturbance.

Evidence

A significant number of existing Heathrow flights use the Compton Route. Due to problems with the design of the route it has the poorest track keeping and subsequently causes low flying aircraft and excessive noise disturbance to the communities of Ashford and Sunbury.

The Noise & Vibration assessment makes the assumption that the existing Compton departure routes (from both 09R and 09L) would be replaced with Precision Based Navigation (PBN) routes. The Airspace Change Process (ACP) for this change has commenced and indicative PBN routes have been devised in order to inform the PEIR noise assessment.

Detailed information about the changes to the Route are currently unavailable, likewise no information or assessment details have been provided about the noise impacts of the new route or whether mitigation to residences will be required.

Nuance

The ANPS (paragraph 4.12) requires the assessment and mitigation (5.240) of environmental impacts.

Division

Noise and Health

Environmentally Managed Growth No ATM Limit

Action

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.

Title

Through the DCO process Heathrow will be seeking to the use of environmental envelopes or caps, to limit the growth of Heathrow rather than caps on the numbers of ATMs.

Topical Issue

Air traffic could exceed 740,000 movements per year, with growth associated with on-site and off-site development being unregulated and without meaningful consultation with local communities, and stakeholders such as planning authorities, local pollution control authorities, and transport planners.

Evidence

Heathrow states “that imposing a capacity cap is a crude measure which provides no incentive to continually enhance environmental performance as an airport grows. Once a cap has been reached there is no ongoing incentive to continuously reduce effects.” Heathrow also states that “the ANPS does not seek to cap the number of aircraft movements at an expanded Heathrow. That in fact, the ANPS calls on Heathrow to bring forward a scheme enabling **at least 260,000 additional ATMs per annum**”. Surely there must be an overall ‘absolute maximum’ cap to prevent Heathrow growing exponentially, even if environmental targets are somehow met.

Heathrow sets out its intentions to develop a framework to operate within clearly defined environmental limits to ensure that the maximum effects of Heathrow’s expansion do not exceed those considered acceptable having regard to the ANPS, for surface access (traffic), air quality, aircraft noise, and carbon.

Aircraft noise has been found to be the most annoying of transport noise, and it is not just an issue of loudness but the incessant nature of the disturbance that causes annoyance and thus the associated health and quality of life impacts. These in particular are the sort of growth impacts associated are aspect that would not be addressed through Heathrow’s proposal for Environmentally Managed Growth. The other consideration is the ‘other’ growth factors associated with airports which contribute to noise and other pollutions including air and carbon, in particular those arising from the growth of road traffic and supporting industries. Heathrow recognises its inability to control aspects of growth within Appendix B.

Heathrow states the precise environmental limits proposed for inclusion in the DCO application are to be finalised following feedback from this consultation, ongoing engagement and the completion of the Environmental Impact Assessment.

Nuance

The CAA’s documents on managing noise (CAP1165) and guidance on noise envelopes (CAP 1129) both state that a change in primary or secondary legislation may be required for noise envelopes to be implemented effectively and enforceable by law.

Currently, neither the CAA nor ICCAN have enforcement powers in respect of aviation and its impacts on communities and the environment. Communities need to have infrastructure

systems they can believe in, not ones that are seemingly largely regulated and controlled by industry.

Heathrow recognises its inability to control aspects of growth within Appendix B of its document Environmentally Managed Growth.

Division

Noise and Health

DRAFT

Inappropriate Ventilation – Noise Insulation

Action

For the protection of resident's health Heathrow must have regard to guidance provided within Building Regulations 2010, guidance document F (ventilation) in the design of insulation of affected properties.

Title

The insulation methodology proposed by Heathrow needs to be re-evaluated to ensure that it is practical, efficient and does not compromise human health.

Topical Issue

The insulation provision by Heathrow can lead poor air quality within homes and subsequent poor health of residents.

Evidence

The 45 dB $L_{Aeq,16h}$ internal noise is derived from the 'precautionary and conservative' assumption that all exposed dwellings provide a level of insulation that ensures a 26dB external to internal sound level difference when windows are closed. While this might indeed be precautionary and conservative for good quality, well installed windows, it is highly unlikely that this would be achievable by old, ill-fitting or improperly functioning windows.

It should also be recognised that having to close windows to achieve acceptable internal noise levels leaves properties exposed to overheating on a warm day, a matter of increasing concern given current weather patterns. Trickle vents, even if they are able to maintain the 26dB external to internal noise level difference are not adequate to account for boost heating on the warmest days and the only option in the absence of forced ventilation is to open windows.

Further, significant adverse effects can only be avoided inside noise sensitive receptors if appropriate sound insulation is provided before noise levels reach or exceed the SOAEL value. The PEIR does not explicitly state that this will be the case but instead only commit to a prioritised programme of noise insulation.

As part of the Expansion Consultation, Heathrow has prepared a Noise Insulation Policy (June 2019), section 5 (Delivery) sets out the phasing of the scheme and responds to the need to prioritise properties on the basis of noise exposure. It is accepted that any process involving notifying, liaising and entering contractual agreements with the public does take time, however, it is still important to safeguard that all reasonable efforts will be made to ensure that where insulation is accepted it is installed before significant adverse effects arise.

Heathrow is leaving residents exposed to seriously high levels of noise with the choice to either open window to ensure a clean source of air, or to be exposed to high levels of noise. This is not reasonable or appropriate choice to expect residents to make.

Nuance

The ANPS includes a topic on Noise but the issue raised here is too specific to be covered by the ANPS directly. However, there is reference to noise mitigation measures following best practice and relevant British Standards, plus other relevant guidance (NPS paras. 5.54 to 5.66)

Division

Noise and Health

Methodology Assumptions and Adopted Air-Grounded Noise Values

Action

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.

Title

Commentary on methodology, assumptions and adopted values for aircraft air noise/aircraft ground noise.

Topical Issue

Noise levels calculated could be incorrectly determined.

Evidence

It is unusual to allocate exactly the same values to aircraft air noise as to aircraft ground noise (Noise & Vibration, table 17.14). The character of these two noise sources close to an airport is quite different; air noise is characterised by a series of transient, high noise levels events while ground noise is relatively continuous and perceived as either steady state or gradually fluctuating throughout the day/night period.

The daytime and night-time LOAEL values for air noise are set by the government in the Aviation Policy consultation documents. No reference is made in policy to ground noise.

As an example of how the two sources would be treated differently, reference can be made to the WHO Night noise guidelines for Europe which applies to steady state noise and identifies 40dB L_{night}^1 as being equivalent to LOAEL. This position was adopted in the Heathrow Cranford Agreement ES, suggesting that the same value would be appropriate for ground noise assessments as part of this PEIR.

Nuance

Full details of the noise assessment along with validation and verification of all assumptions and adopted values have not been made available for assessment. Good practice would require that full disclosure be given for assessment and consultation.

Division

Noise and Health

¹ $L_{night} = L_{Aeq,8h}$ for aircraft noise on an annual average day

Methodology Assumptions and Adopted Values Future Noise Generation by Aircraft

Action

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 these values may not fall as quickly as the current DCO analysis suggests.

Title

Use of an overly optimistic rate of improvement for aircraft noise certification.

Topical Issue

The PEIR assessment underestimates noise levels from aircraft in future years, thereby underestimating the noise impacts to residents and noise from aircraft.

Evidence

Aircraft noise rating -The Noise & Vibration Appendices identifies three rates of noise reduction for future aircraft types. These reflect changes in the sum of noise levels at the three certification points (approach, flyover, lateral). They do not reflect the change in noise level that might be experienced by a person being overflown at a given location. Higher reductions are expected at flyover and lateral locations (which are more affected by engine noise) than at approach locations (which are more greatly affected by noise from the airframe). The above mentioned worst case is discounted due to the importance of noise around airports and the best is considered unlikely due to the greater investment required in the necessary noise reduction technologies. The rate of change selected for assessment is therefore 0.4dB per year (cumulative change at the three certification points). This estimate of future noise improvements is more bullish than the values of 0.1dB (allowing for evolutionary changes only) and 0.3dB (allowing for periodic revolutionary changes) used by Sustainable Aviation² to predict trends in future aircraft noise.

Quota Counts (QC) - the Noise & Vibration Appendices sets out the QC values allocated to aircraft types for the likely operating scenario underpinning the DCO assessment. The introduction of the QC 0.125 category raises the expectation of similar developments in the future. We therefore question whether future generations of narrow body, single aisle aircraft such as the A320NEO and Boeing 737MAX will actually be allocated a QC value of 0 on departure.

Nuance

The ANPS requires Heathrow to assess, mitigate and minimise the impacts of increased airport operation. The first stage of this requires appropriate detailed assessment

Division

Noise and Health

² <https://www.sustainableaviation.co.uk/wp-content/uploads/2018/06/SA-Noise-Road-Map-Report.pdf>

Methodology Assumptions and Adopted Values Noise Interventions Levels

Action

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.

Title

Commentary on methodology, assumptions and adopted values for the 'LOAEL, SOAEL, and UAEL'

Topical Issue

Potential exposure to residents in Stanwell Moor in the northern part of Spelthorne of noise levels above 69 LAeq,16h.

Evidence

It is not known why Heathrow has set the daytime UAEL value at 71 dB LAeq,16h rather than 69 dB LAeq,16h. This value has certainly been adopted at other airports where substantial planning applications have been made (London City, Stansted, Luton).

Heathrow's choice of 71 dB LAeq,16h gives rise to an anomaly when considering the DCO proposals that it will seek powers to compulsorily insulate residences at that value when residents have refused the offer to relocate or insulate. The anomaly is that some residents may be exposed to daytime levels above 69 dB LAeq,16h, not willing to move and remaining in a property where internal noise levels are above the onset of unacceptable noise levels, 45 dB LAeq,16h, as defined in paragraph 18.1.6 of Annex F-8 in the Noise and Vibration Appendices.

Nuance

69 dB LAeq,16h is referenced in the Aviation Policy Framework as being the noise level that should mark the offer of assistance with relocation. The Government's view is that people should not be living in houses exposed to this level of noise.

Division

Noise and Health

Night Flights Ban is not 6.5 hours

Action

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.

Title

Night time ban proposed does not provide 6.5 hours as required by the ANPS.

Topical Issue

The night flight ban only provides a 5.55 hour ban, not the full 6.5 hours required by the ANPS.

Evidence

To meet the ANPS requirement of no flights within a 6.5 hour period between 23h00 and 07h00, Heathrow is proposing to ban flights scheduled from operating between 23h00 and 05h30. Since the ban specifically covers aircraft schedule times, the effect of the time taken to travel between the stand and the runway must be factored in.

Paragraph 17.5.49 indicates that up to 15 minutes should be allowed for departing aircraft and up to 20 minutes should be allowed for arriving aircraft. What this means is that aircraft cannot use the runway as follows:

- Departures - 23h15 to 05h45
- Arrivals - 23h10 to 05h10

The proposal put forward by Heathrow means that the time for which the runway can be expected to be out of use is only 5 hours and 55 minutes (23h15 to 05h10). The period during which people in the community around the airport will be relieved of noise from aircraft in flight would be less than the 6.5 hours that might have been expected. This reduces even further when the 'recovery period' to handle delays is operating. Given the current airspace congestion in the south east of England, weather variability and not infrequent industrial action by European air traffic controllers, it is not realistic to assume that there will be no delays to daytime scheduled departures that cause aircraft to depart after 23h00. Such delays were important contributors to the breach of the night-time noise envelope condition at Luton Airport in 2017 and 2018 and are a common feature of current air travel.

Taken in to context with the voluntary night ban provisions currently in place (departures 22h50 to 06h00, arrivals 23h05 to 04h45). Allowing for the same stand to runway travel times this converts into a runway quiet time of:

- Departures - 23h05 to 06h15
- Arrivals - 22h45 to 04h25

This means that the runway use time will extend by 10 minutes at the beginning of night (23h05 to 23h15) but reduce at the end of the night by 45 minutes (04h25 to 05h10), providing a net reduction of 35 minutes.

Nuance

The ANPS ^(paragraph 3.54) requires a "highly valued scheduled night flight ban of six and half hours between 11pm and 7am (with the exact start and finish times to be determined following consultation)".

Division

Noise

Predictable Periods of Respite

Action

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.

Title

“The applicant should put forward plans for a runway alternation scheme that provides communities affected with predictable periods of respite.” (ANPS, 5.61)

Topical Issue

The communities of Stanwell and Stanwell Moor will not be provided with full and appropriate periods of respite free from aircraft noise, they will still be exposed to excessive aircraft noise during the stated periods of ‘Respite’.

Information provided by Heathrow states “When there is no noise overhead, there will still be noise from planes on the ground and on the existing runways. The Stanwell and Stanwell Moor communities will hear noise from aircraft engines as they taxi from the terminals to the runway for departure. The engine noise will increase as the pilot accelerates away down the runway to take off but there would be no planes overhead” (Heathrow Expansion and Your Area – Stanwell and Stanwell Moor, pg. 44).

Heathrow is interpreting the ANPS requirements for ‘predictable periods of respite’ as being free for having planes overhead. The ANPS does not suggest that respite only means being free of noise from overhead flights. The ANPS (3.58) states that the “Northwest Runway scheme would provide respite by altering the pattern of arrivals and departures across the runways over the course of the day to give communities breaks from the noise”

Evidence

The Government recognises that ‘respite from noise’ is important to residents and communities. The Government made a preference for the Heathrow Northwest Runway based on a number of factors which included “Respite from noise for local communities” (ANPS³, 3.57).

The ANPS states that the “Northwest Runway scheme would provide respite by altering the pattern or arrivals and departures across the runways over the course of the day to give communities breaks from the noise”(ANPS, 3.58)

The ANPS states that the applicant is required to put forward plans for a runway alternation scheme that provides communities affected with predictable periods of respite (ANPS, 5.61)

Noise is recognised as causing significant negative impacts on resident’s and community health and well-being. Aircraft noise is proven to be the most annoying of transport noise. Prolonged exposure to high levels of noise can cause harmful health effects. Long-term noise exposure may lead to problems with heart and circulatory (cardiovascular) systems and night-time noise is particularly disruptive of sleep patterns, which in turn may lead to cardiovascular health problems (noise impacts on health⁴).

Nuance

The ANPS states that the “Northwest Runway scheme would provide respite by altering the pattern or arrivals and departures across the runways over the course of the day to give communities breaks from the noise” (ANPS, 3.58); and the applicant is required to put forward

³ Airports National Policy Statement: new runway capacity and infrastructure at airports in the south east of England, June 2018 (ANPS)

⁴ <http://ec.europa.eu/environment/integration/research/newsalert/pdf/47si.pdf>

plans for a runway alternation scheme that provides communities affected with predictable periods of respite (ANPS, 5.61).

Division

Noise and Health

DRAFT

Reducing Noise Footprint against 2013 ANPS Baseline

Action

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.

Title

Heathrow's ongoing promise to share the benefits of future (noise) improvements with communities

Topical Issue

Without an agreement in place, there could be no further reduction or at best limited and slow reduction of the Heathrow noise footprint.

Evidence

Heathrow made promises at the Terminal 5 enquiry that it would not look to expand beyond a 5th terminal. Over the years Heathrow has advertised widely the improvements in the noise environment associated with Heathrow Airport which has largely been brought about by new technology and quieter aircraft.

Heathrow has promoted the comparison of the noise footprint between 1974 and 2013, comparison of the 2014 and 2015 footprint presents a 2% reduction in noise between 2014 and 2015. While no official reports have been published since, Heathrow has been stating that it has continued to make further reductions in the noise footprint year on year.

The expansion of the airport through the introduction of a 3rd runway will remove any improvements in the noise environment gained since 2013.

Nuance

ERCD REPORT 1601 Noise Exposure Contours for Heathrow Airport 2015 reports:

- The 57 dBA Leq day contour area for 2015 based on the actual runway modal split (78% west / 22% east) was calculated to be 102.5 km², 2% smaller than the previous year (2014: 104.9 km²; this was 107.3km² in 2013). The population enclosed decreased by 4% to 258,300 (2014: 270,100).
- The 48 dBA Leq night actual modal split (77% west / 23% east) contour area was 111.5 km², a decrease of 2% (2014: 114.2 km²). The enclosed population was 399,100 (2014: 364,400), an increase of 10% from the previous year.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582641/heathrowairport-noise-2015.pdf

Division

Noise and Health

DRAFT

Air Quality

DRAFT

Air Quality and Human Health Impacts

Action

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.

Title

Air Quality – human health impacts in Spelthorne.

Topical Issue

Not all areas of Spelthorne where air quality is at risk of exceeding National Air Quality Objectives have been included within the Core AQ Study Area. Even where no breaches are predicted there will be a worsening of air quality that will impact on the health of Spelthorne residents.

Air quality modelling is based on outline traffic modelling that assumes ANPS surface access targets would be met and excludes various key vehicle/ trip types from no more Heathrow-related traffic pledge. If surface access ANPS targets are not met, air quality targets will also not be met.

Evidence

There is a high degree of uncertainty modelling so far into the future. In addition the traffic modelling is only a preliminary forecast based on “the best information that is currently available”. Insufficient evidence is presented on the traffic forecast assumptions and inputs (flow, vehicle type and speeds) for roads through Spelthorne to enable critical review of the air quality modelling outputs.

For example, presentation of the dispersion modelling results (PEIR Tables 7.26 onwards) show the maximum concentration anywhere in the area for the baseline, future without DCO and future with DCO scenarios - where it should present absolute values for the same receptors, to enable critical review and be able to determine overall significance. Results are only presented for 18 selected “representative” locations in Stanwell and 12 locations in Stanwell Moor. For Stanwell Moor the predicted maximum nitrogen dioxide concentration increase ramps from 2.5% of the air quality limit value (+1.0 ug/m³) in 2022 to 9.0% of the air quality value (+3.5ug/m³) in 2035.

The PEIR has not adequately demonstrated that assumptions are a reasonable worst case; given the geographical and temporal scale of the project, coupled with level of uncertainty inherent in air quality modelling itself, the composition and emissions performance of the road transport fleet, and the reliance on incentivised modal shift through public transport initiatives. This is a key limitation.

The future baseline appears to reduce nitrogen dioxide by ~12 ug/m³ in some areas between 2017 and 2022 - e.g. at Stanwell Moor the 2017 baseline maximum concentration is set as 40.4 ug/m³ and the 2022 future baseline as 29.6 ug/m³. It is not apparent that this is a realistic level of change, especially given the statement in PEIR paragraph 7.9.10. The Environmental Statement assessment should include statistical analysis of trends in recent monitoring data and include a sensitivity test with future backgrounds if there is not a significant decreasing trend.

From the very limited information presented there are predicted to be several routes through the north of the Borough where expansion will result in 1000+ additional daily vehicle movements. At 2035 it is predicted that there would be over 1,000 additional vehicle movements on Horton Road through Stanwell Moor, southbound on Stanwell Moor Road through the current AQ

hotspot of the Crooked Billet/ A30 junction and then west bound to J13 of the M25. The results presented predict lower traffic levels with expansion on the northbound A3044 Stanwell Moor Road and Town Lane. The only sensitivity test undertaken in the air quality assessment is in respect of the future emission factors of vehicles, and not in respect of scenario testing of alternative traffic flows or routing.

The core air quality study area does not include Sunbury Cross, a key air quality hot spot in Spelthorne. The study area has been extended at Hounslow to include the continuous monitoring station there, but not similarly at Sunbury Cross. In 2019 Spelthorne was requested by Highways England to participate in a new monitoring study on the A316 near Sunbury Cross as Defra's national air quality (PCM) modelling has flagged a possible exceedance of the EU limit value at this location. This issue is not recognised in the consultation documents and thus assurance has not been made that additional Heathrow related traffic would not extend the timeframe for compliance.

The Health Assessment has concluded that air quality impacts on the general population over the whole study area is minor negative in all assessment years. The ('very small percentage') increases in both mortality and hospital admissions are given to relate to increases in NOx emissions from the aircraft and other on-airport activities and not to the changes in traffic emissions. Impacts on an individual community level are not discussed. For vulnerable groups (people with existing poor health, old and young people, and those in proximity to the greatest changes in concentrations) air quality impacts range between minor negative (not significant) and major negative (significant) across the short, medium and long-term. Again this is across the whole study area and not presented at a community level.

Nuance

The accuracy of the traffic model is fundamental to forecasting the expected traffic impacts of colleagues, workers, freight and construction trips resulting from an expanded airport. These forecasts provide the input data for air quality assessment. The uncertainties and input assumptions need to be better recognised and tested with sensitivity testing presented. Justification is required as to why construction traffic is not included given the operation of several construction sites continuously over several decades.

The assessment focuses on whether the DCO creates or delays of a 'non-compliant zone'. This is an extremely narrow interpretation of the ANPS requirement (para 5.42) to be "compliant with legal obligations that provide for the protection of human health and the environment". Indeed ANPS paragraph 5.43 references the wider tests for air quality with "(i) consideration of AQMAs, roads identified as above limit values, nature conservation sites; (ii) Effects that may bring about need for new AQMAs or change the size of an existing AQMA or bring about changes to exceedances of limit values, or have potential to have an impact on nature conservation sites; and (iii) significant effects in relation to EIA, and or to a deterioration in air quality in a zone or agglomeration.

Heathrow are interpreting the no more airport related traffic headline promise very narrowly, excluding traffic generated by airport related development away from terminals and car parks, excluding development displaced by the expansion and excluding construction traffic. This reduces expansion traffic flows and underestimates air quality impacts. The pledge also only relates to vehicle trip numbers and not vehicle emissions. To increase freight capacity at the expanded airport, the proportion of HGV trips increases, which generates more noise, emissions and highways impacts than other vehicle types.

The traffic model does not assume linear changes in mode share up to 2030 but as step changes due to schemes, primarily rail, coming online. What happens if they don't or are delayed, like Crossrail has been already? There should be sensitivity testing of the air quality impacts.

Predictions of lower flows of traffic northbound through the Borough bound for the airport expansion contradicts logic and local experience of the behaviour of motorway users following the guidance of App-based navigation systems rerouting traffic away from the M25 in periods of congestion and following accidents. Whilst highways improvements are proposed on the M25 and junction J14 no sensitivity testing has been presented on impacts of re-routing away from the M25 in the context of how frequently this occurs under current conditions. Given the shift of the airport's front door to J14 under expansion such re-routing across Spelthorne could reasonably be foreseen to increase and potential impacts of this should be considered to present a true worst-case scenario.

AQ mitigation is embedded in documents such as the CoCP and Surface Access Proposals, which are scant on delivery details and is also premised on meeting the ANPS surface access targets.

Division

Air Quality

DRAFT

Ultra-Low Emission Zone and Vehicle Access Charge

Action

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.

Title

Air Quality – Vehicle Access Charge (VAC) and Ultra Low Emission Zone (ULEZ)

Topical Issue

The VAC and ULEZ could push airport-related and through traffic towards the fringes of Heathrow into local roads with consequent traffic and air quality impacts.

Evidence

The VAC charge is anticipated at up to £20. Application of the charge to circa 35 million non-transfer passengers arriving and departing the airport by car, Private Hire Vehicle (PHV) or taxi, the VAC could raise a very significant level of revenue. It is proposed to use it to offset the costs of expansion and keep airport charges to airlines close to today's levels.

In the current proposals the ULEZ and vehicle access charge would only be applicable to passenger vehicles accessing the terminal forecourts and car parks, while colleagues, freight, black cab taxis and vehicle operations would be exempt and PHVs able to receive discounts. The surface access proposals document acknowledges the potential impacts of the VAC pushing vehicles out into local communities but does not address it, deferring the issue for consideration in the Transport Assessment at DCO submission.

Taxi and PHV are the most frequently used transport mode for passengers (non-transfer) accessing Heathrow today (33%) [Para 3.6.8 of SAP]. Overall they make approximately 20% of total vehicle movements (including freight and colleague trips), in and around the airport. Yet at least 70% of taxis and PHVs are empty on one leg meaning they have the same number of vehicle trips as 'kiss and fly' mode.

No detail is given about assumed uptake of low and zero emission vehicles by taxis and PHVs in traffic and air quality modelling.

Nuance

The majority of taxi and PHV trips are made from areas within London and south east England where Public Transport (PT) connection is best – around 70% of taxi and PHV trips are being made entirely to and from Greater London (para 3.6.12 SAP). For UK based passengers the most popular destinations are to areas surrounding Heathrow, particularly those without direct public transport. So improving PT in these areas around the airport and disincentivising taxi and PHV use in favour of PT from Greater London could make meaningful improvements to mode shift. There is insufficient evidence presented that future trip demand with the Project by taxi will be lower than today given current rising trends and proposed future exemptions from ULEZ/ VAC.

The target for backfilling of taxis and PHVs on return trips is not ambitious enough, aiming to reduce empty journeys from 70% to 60% - stepping down from a CN1 aspiration to backfill 20% of all empty taxi and private hire vehicles. The consultation does not provide any real strategy or commitments as to how the target would be achieved – surface access proposals talk about possible initiatives being considered by Heathrow without any commitments to implementation. What impacts would arise from achieving a higher level of backfill or failing to meet the target?

In its current form the VAC and ULEZ could promote airport parking by passengers in Heathrow controlled car parks increasing their revenue without maximising mode shift or uptake of lower emission vehicles by other vehicle types excluded from the schemes such as taxis/ PHVs, buses, coaches and freight.

If the aim of the ULEZ is to improve air quality, more clarity is required as to why buses, coaches and freight should be exempt from an emissions charge when they generate a notable proportion of emissions despite only being a small percentage of the trips. If operators were subject to a charge this would help incentivize updating their fleets to clean technology.

For example, air cargo represents 2,940,000 annual vehicle trips to and from the airport and Airline servicing and aircraft maintenance represents a further 910,000 annual vehicle trips to and from Heathrow. Whilst in total freight trips represents just 5-6% of total daily vehicle numbers, they are estimated to generate around 36% of vehicle related emissions. A direct link is required between the Dnata cargo area and the Cargo Centre to remove unnecessary HGV movements from the public highway.

The VAC should not be a means to supplement Heathrow's revenue stream but should be placed in a ring-fenced fund to support local transport infrastructure improvements and to subsidise public transport services/ fares. An independent board or working group of relevant stakeholders should have oversight into funded schemes.

Colleagues should only be exempt from the ULEZ and VAC if comprehensive workplace charging scheme were implemented for all colleagues and across all colleague parking areas.

Why would PHVs receive a ULEZ discount? What behaviours will this incentivise? Any discounts or exemptions should be purely based on emissions (and possibly backfilling).

Powers to ensure that all private hire operators make use of the authorized vehicle area are required within the DCO, together with a clearer monitoring and enforcement strategy.

Division

Air Quality

Air Quality Impacts on Biodiversity

Action

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

Title

Air Quality – impacts on biodiversity in Spelthorne

Topical Issue

As the Staines Moor SSSI, SWLW SPA/Ramsar site and Wraysbury Reservoir SSSI currently experience nitrogen concentrations in exceedance of the critical level (although deposition is well below the critical load) further increases could result in harmful effects on the designated features present through habitat degradation. The concentrations of NO_x could result in direct toxicity to individual plant species, which could affect the availability of food plants for the notified waterbirds. Construction activities are proposed within 1km of Wraysbury Reservoir SSSI, and this could directly significantly impact on its bird populations

Evidence

The assessment of nitrogen emissions on designated sites is qualitative only. Publication of Defra guidance is awaited which could influence assessment of the likely significant effects, but the simplistic qualitative assessment methodology is mainly because traffic model predictions (and therefore detailed air quality modelling outputs) are not available for most designated sites. No specific travel model predictions have yet been derived for the road network within 200m of most biodiversity sites, European sites, and of the 116 SSSIs so qualitative assessment reduced to whether traffic levels are predicted to rise or not. Where they are the scale of change assigned is medium and the impact as significant.

For Staines Moor SSSI and the SWLW SPA / Ramsar site outline traffic model predictions have been used as a proxy as the likely largest source of pollutants. These show that along Stanwell Moor Road (which runs between the Staines Reservoirs and King George VI Reservoir) an increase in traffic of 5.6% by the year 2035 is predicted with expansion. The number of additional vehicle movements is ~1,100 and the preliminary assessment is that the scale of change is predicted to be medium, and the effect significant.

For Wraysbury Reservoir SSSI the road network will be altered in this area and so a detailed comparison between the baseline situation and the DCO Project is yet to be completed. Traffic levels are predicted to rise in the locality, so again the preliminary assessment is that the scale of change is medium and the effect significant.

Nuance

Paragraph 5.89 of the ANPS states: “The applicant should ensure that the environmental statement submitted with its application for development consent clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological importance, protected species, and habitats and other species identified as being of principal importance for the conservation of biodiversity”.

However, currently effects are evidenced on broad brush judgement and not baseline data. Further Paragraph 5.96 of ANPS states: “Where significant harm cannot be avoided or mitigated, as a last resort appropriate compensation measures should be sought.”.

No mitigation is offered for impacts of nitrogen deposition, biodiversity offsetting (reproviding habitats elsewhere) does not in this case mitigate or compensate the impacts as the new

biodiversity sites may likely be impacted by nitrogen deposition too as the impacts are given to be felt across all SSSIs of the study area. Insufficient assessment as yet to enable interpretation of whether compensation is appropriate.

Division

Air Quality

DRAFT

Construction

DRAFT

Constructional and Operational Phase Impacts

Action

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.

Title

Air Quality – construction phase impacts

Topical Issue

A minimum 60% PT mode share for construction workers is required to meet the NPS AQ targets. This mode share is currently only an aim and not a firm commitment. There is insufficient detail available currently to provide assurance that assessments will be backed up with monitoring of real world impacts and enforcement.

Evidence

There is a lack of detail on the quantum or impact of construction traffic. The preliminary Outline Construction Traffic Management Plan (POCTMP) states that air quality modelling demonstrates that a minimum of 60% mode share of construction workforce is needed “to make the necessary reductions in car movements on the network to satisfy AQ and congestion limitations, especially in particularly sensitive AQMAs”.

The public transport share of construction workers in the Construction Worker Travel Plan (CWTP) ‘aims’ to be 60% over the construction period. What is the expected public transport mode share during the peak construction years up to 2026? Even assuming that 60% PT mode share is achieved, at the peak of construction there would be 5,600 workers arriving per day by car. Heathrow has assumed a vehicle occupancy of 1.5 workers per vehicle. Is this high level of lift sharing realistic? Whilst this suppresses the number of construction worker trips to be included in the traffic modelling down to 3,733 two-way trips per day, the parking provision for construction workers is proposed as 4,000 – 6,000 spaces.

The Traffic Management Working Group (TMWG) will have overall responsibility for co-ordinating the implementation of the detailed CTMPs and CWTPs. Heathrow will have overall responsibility for ensuring that the main contractors implement, monitor and enforce CTMPs and CWTPs.

Vehicle standards for Petrol LDVs is EURO 4. This relates to vehicles registered between 2006 to 2011 so by DCO submission would be 10-15 years old. This is not akin to a World Class development. Whilst theoretically there are only small NOx emission savings between manufacturer tests of EURO 5 and EURO 6 LDVs there were no PM limits on EURO 4

vehicles and engines at 10-15 years old are unlikely to run as efficiently as indicated in manufacturer's tests.

The IAQM Methodology for risk assessment of dust and odour impacts considers demolition, earthworks, construction and trackout activities. The methodology assumes one 'development site' rather than the extensive network of expansion development of the DCO red line area with 'satellite' construction supporting sites. The assessment has considered that receptors to the south of the airport will be some distance from key construction activities, but the reality is that CCS, such as CS10 and CS11 will be 50m and 10m from residential receptors with large scale construction and trackout activities for periods of decades. Road and river realignments through Stanwell Moor and Stanwell have the potential to fulfill large scale earthworks and construction activities in their own right. Construction of the new A3113 and Stanwell Moor Road roundabout circa 2024 is to include sinking of the through running A3113 down to 8m below the new graded separated (multi-level) roundabout.

Baseline dust levels in the PEIR are expected to be well below levels likely to cause annoyance due to the existing land uses in the area and lack of sources of dust. This generalisation is at odds with large existing mineral and aggregate recycling and other waste processing sites in Stanwell & Stanwell Moor (notably at Hithermoor, the Cemex site and Oakleaf Farm).

Internal construction roads are not proposed to be black-topped and could be compacted granular material. Para 5.5.4 worryingly states "continued maintenance of the haul roads will eventually produce a stable and polished surface of low rolling resistance that will, if properly maintained, give good service to the dump-trucks". This raises concerns about dust generation to be tolerated in the intervening period and a lack of concern about spread of potentially contaminated dusts from exposed historic landfill sites.

Nuance

Significant air quality impacts above EU Limit Values have been identified at Brandshill AQMA in Slough in the construction phase. These are discussions that this could be solved by routing. The inference from this could be that current assessment of air quality impacts in Spelthorne is not worst case as additional construction traffic may have to be routed through and along Spelthorne's boundaries to divert away from Brandshill. Even before this up to 41% of construction traffic is expected to access Heathrow via J14 of the M25.

The proposed parking provision at 4-6,000 spaces is 107 – 160% of the 'maximum need', way above the 20% buffer for shift change stated. Why are so many construction parking spaces needed? The impact will be no parking constraint and failure to meet the 60% public transport target. No sensitivity testing of traffic and air quality impacts of failing to meet the 60% aim is presented in the consultation.

Within the CWTP Heathrow appear to be relying on a statement that public transport connection is poor from the south and west of the airport and as such construction workers will have no alternative to drive. This conflicts with other surface access strategy assurances that expansion will improve PT around the airport or that shuttles will be provided from population centres where needed.

There is no discussion in the Travel Plan of penalties for failing to meet mode share aspirations for construction workers. Given the statements about necessity of reducing car movements to satisfy AQ and congestion limitations this is unacceptable. Firm commitments on mode share are required as are mechanisms to address shortcomings in delivery.

Active travel modes for construction workers have not been included in current modelling and there are few committed measures in the Travel Plan to incentivise active travel (despite

60% of the total construction workforce expect live within 15 miles of Heathrow). Even basic measures such as cycle stands, showers and lockers at construction supporting sites are not committed. Car park management systems such as permits (which would Act to constrain parking) is only under consideration.

It is unclear why local highways authorities, Highways England and TfL and other stakeholders as members of the TMWG should have responsibility for coordinating the implementation of Heathrow's environmental management plans. This body should have oversight but a role in implementation needs further explanation. It is also unclear who Traffic Safety and Control Officers would report to.

The CoCP is relatively high level due to the immaturity of proposals for individual sites. At a high level the approach appears fit for purpose but much critical detail still needs to be worked on within future workstreams and documents. In many areas, commitments are caveated through the use of wording such as "where reasonably practical". The CoCP refers to a number of future and further strategies and plans which need to be submitted with the DCO or subsequent to consent. Engagement on these documents is needed ahead of DCO submission.

Division

Construction

DRAFT

Construction Impacts on the Stanwell (CS10) and Stanwell Moor (CS11)

Action

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.

Title

Construction – community impacts on Stanwell Moor and Stanwell from CS11 and CS10, respectively.

Topical Issue

Over 1,000 additional vehicle movements (HGVs, LDVs and construction workers) per day through Stanwell Moor village on Horton Road (accessing from J14 and from Stanwell Moor Road) throughout the construction period. Construction sites in the Borough could cause unacceptable nuisance and health impacts from 24/7 operation every day for years. Community impacts could result from temporary worker accommodation from construction supporting sites in the Borough.

Evidence

Access to the Expansion Development Area will be through the Construction Supporting Sites (POCTMP, para 4.4.1), which is not indicated on the figures showing construction traffic routing throughout the consultation materials where construction routes are shown as on a northern spur from the Stanwell Moor Roundabout. The Stanwell and Stanwell Moor consultation brochure is the only place where any detail is provided on the level of construction vehicle movements through the Borough. Plans on page 39 are annotated with total flow change (+1000 to -1000) without any metric, presumed as flow change on the annual annual daily flow. This indicates over 1,000 additional vehicle movements per day in 2022 between The Anchor and the Village Hall as construction vehicles access the Construction Supporting Site CS11 from both J14 and Stanwell Moor Road. By 2035 there would be over 1,000 additional vehicle movements along the whole length of Horton Road due to expansion.

Construction Proposals para 5.4.4 and POCTMP para 4.3.4 both state that “where access on lower classification local roads and roads within residential areas is unavoidable, Heathrow and the main contractors will implement measures to mitigate and manage negative effects”. No details are provided to back up this assurance.

In the options appraisal for construction supporting sites only high level consideration of access to CS11 was given and it scored green for surface access based on proximity to T5 and future western campus. The site is also given to be suitable for car parking on the basis that a bus shuttle service could easily access the main work sites in this zone, so construction traffic implications for this community could be further increased and it is unclear to what extent, if at all, this additional construction traffic has been included within the AQ assessment for this area?

Peak construction movements (HGVs and LDVs only) is “indicatively estimated” as around 1,700 two way movements per day with up to 41% accessing via J14. The POCTMP is framework only and many key measures such as use of rail, re-timing for out of peak deliveries and use of larger vehicle to reduce number of vehicle trips are being considered and not committed to. The POCTMP admits that further work is required which may lead to

a shift of peak activity as well as total vehicle numbers. A transport assessment for the construction years has yet to be developed.

In the options appraisal for CS11 there was no mention of potential land quality issues from historic landfill on-site, which scored against other possible sites. Only potential adverse impacts on adjacent community were considered, whilst sites more remote from communities were given as likely adverse amenity impacts on the adjacent community. Site is scoring highly based on being a “large undeveloped site with some hope value”.

Construction sites are to work 24/7 365 days per year throughout the earthworks phase and beyond. There is no detail as to which sites may not operate 24/7 or where ‘appropriate’ buffer zones will be used or when stakeholders will be provided with and consulted on these details.

Assurances made in bilateral and HSPG engagement that there will be no temporary construction accommodation in Spelthorne are not replicated in consultation materials.

Nuance

Options appraisal for selection of CS11 has not properly considered the constraints of the site and the scale of likely impacts on the community. Why, when CS11 is in the preferred masterplan as a community greenspace, is hope value of relevance? This does not allay concerns about whether the community would eventually get their greenspace after waiting up to 20 years. No reassurance is provided that the boundaries of CS11 or CS10 will feature noise barriers, buffer zones or restricted working hours to minimise nuisance and health impacts to the residents living on their boundaries.

Division

Construction

Longevity and Restoration of Temporary Construction Sites

Action

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.

Title

Construction Supporting Sites - Longevity and Restoration

Topical Issue

The Stanwell Moor Community is being misleading about the longevity and impacts of CS11. Without committed end dates temporary CS site use could overrun to the whole life of the development to 2050, equating to nearly three decades of use.

Evidence

Construction site CS10, the Cemex site at Stanwell Quarry, is due to operate wholly or partly as a construction site from 2021-2033, with the Southern Parkway being built out in phases across it between 2026 to 2035. Construction site CS11, the former Streeters site north of Horton Road in Stanwell Moor, will also operate from 2021 to at least 2034. The illustrative Preferred Masterplan shows built development of new cargo related ASD on CS12 and green space on CS11. Delivery dates for these end uses are not confirmed in the consultation.

The longevity of CS11 and CS12 is couched in relation to benchmarks of passenger throughput, specifically until 130 mppa is attained.

Nuance

No commitments are made to absolute end dates for construction sites CS11 and CS12.

There are conflicts in timeframes of use for CS11 throughout the consultation documents. For example, the Preliminary Environmental Information Report has figures showing CS11 present until Phase 4 (2034 – 2050) whereas Stanwell and Stanwell Moor brochure shows CS11 as enhanced green space from 2026. Most residents and stakeholders will only review the local area brochure and are being misled as to when they will get a green space benefit in their community.

References to hope value in the appraisal of both CS11 and CS12 offers no reassurance on ultimate delivery of promised green space at CS11. Hope value is the term used to describe the market value of land based on expectation of getting planning permission for development on it.

Residents in proximity to CS10 will be impacted by construction for at least 14 years. With the Parkway being built out in phases there is increased risk of elongated timelines or even another type of ARD development if Heathrow decide the full quota of parking is not required. There is inconsistency within consultation documents as to whether hotels will be provided at the Southern Parkway.

Whilst the area of ASD at CS12 is smaller than that shown at CON1, impacts on the adjacent SSSI land should still be assessed.

Division

Construction

Community Engagement on Construction Impacts

Action

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.

Title

Community engagement on construction.

Threat

Local communities in Stanwell Moor and Stanwell Village already feel disenfranchised by Heathrow, potentially exacerbated by the lack of discussion during workshops and other engagement events on the impact construction will have upon them. More information is now available within the AEC documents but further detail will be required in order to properly engage with residents and businesses so they can be assured that appropriate mitigation and controls are in place during the lengthy construction period.

Evidence

The construction impacts of expansion have potential to cause more disruption and harm to local communities than the effects of the expansion itself once complete. These impacts were relayed to our communities late in the process of engagement, despite Spelthorne raising this with Heathrow in advance of stakeholder workshops. There is the risk that further detail, strategies and management plans relating to construction that will be key to safeguarding the amenities of local businesses will not be the subject of meaningful engagement and consultation if they are being submitted with the DCO. This includes the Community Engagement Plan, a draft of which is not due to be submitted until submission. It will contain procedures for informing communities of the construction activities, timetables, how effects will be managed and provide a small claims process. These details should be known ahead of the DCO submission. Other documents and strategies, such as the Code of Construction Practice, the Construction Traffic Management Plan, Construction Workforce Travel Plan and the Construction Worker Accommodation Strategy, also need to be consulted on before DCO submission following engagement with local authorities and communities.

Nuance

There is no specific topic area within the assessment of impacts in the ANPS relating to construction. Rather, it is considered within many of the topics alongside operational impacts, and mitigation should apply to both the construction and operational phases of the expansion, particularly surface access and community.

Division

Construction

Construction Working Hours

Action

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.

Title

Working hours during construction.

Topical Issue

Given the proximity of the Construction Support Sites to local communities in Stanwell Moor and Stanwell, there is potential for significant disruption and disturbance that will be exacerbated by night-time and weekend construction activities.

Evidence

Construction Support Sites CS10 and CS11 are located within close proximity of residential properties in Stanwell Moor and Stanwell Village. The sites will be operational for a lengthy period of time and without careful and considered mitigation would result in noise, air pollution, dust, light pollution and increased disturbance from traffic on nearby homes. Mitigation, management, monitoring and enforcement needs to be robust and included within the Code of Construction Practice (CoCP). At present, there is still a lot of detail that needs to be included within the draft CoCP. Reference is made at 4.1.7 of the draft CoCP to considering locations and activities where 24/7 working may cause unacceptable effects but it is proposed that these will be within the version of the CoCP submitted with the DCO and are not yet available. This is too late for meaningful engagement with local authorities and affected communities. The principles set out for when 24/7 working may apply are fairly broad and could be used to justify a range of unneighbourly activities when applied to a specific element of construction.

Within each support site, consideration needs to be given to the most neighbourly layout to ensure the uses likely to cause most disruption are located furthest from residential properties, particularly at night and weekends, or where daytime working would cause particular disturbance. Provision within the draft CoCP for site layout, good housekeeping, lighting and security is standard at present and further detail on a bespoke site by site basis will be required. It is imperative that these provisions are consulted on before submission of the DCO.

The proposals for 24/7 working will be heavily reliant on the strategy for transporting workers in and out of the site, given the limited public transport options at certain times, particularly to the south of the airport.

Nuance

There is no specific topic area within the assessment of impacts in the ANPS relating to construction. Rather, it is considered within many of the topics alongside operational impacts, and mitigation should apply to both the construction and operational phases of the expansion, particularly surface access and community.

Division

Construction

Need for Key Worker Accommodation on Site

Action

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.

Title

Worker accommodation during construction

Threat

Making insufficient provision for on-site construction worker accommodation risks the siting of unauthorised caravans that can result in lengthy enforcement action by local planning authorities. Unplanned and unruly encampments can also have a detrimental effect on local communities.

Evidence

Heathrow anticipates the majority of the being drawn from the existing labour market residing within a 'commutable distance' of the airport. In common with other local authorities around the airport, it is likely there would not be an adequate supply to meet demand. Contingency plans need to be put in place if need for worker accommodation displaces other local need. If the WPOZ were extended into parts of the Borough, as pushed for by Spelthorne and local campaign groups, this would offer a supply of vacant housing for construction workers in close proximity to the support sites in Stanwell and Stanwell Moor. The Construction Worker Accommodation Strategy referenced at 5.6.5 of the Construction Proposals is not due to be available in draft form until submission of the DCO. This is too late in the process for such a key document and will need to be developed and consulted upon in advance of submission. There must be a detailed assessment of supply and demand for temporary accommodation and a strategy for engaging with local authorities that should be subject to consultation as part of the AEC, given that the DCO process is not a consultation stage.

Public transport connectivity is poor in certain areas, particularly to the south of the airport and at night, yet 24/7 working is proposed. These deficiencies need to be identified and catered for to avoid reliance on the private car.

Areas of hardstanding within some of the construction support sites will be available for workers to bring their own caravans. In Spelthorne, these sites are very close to local communities and CS11 is due to be operational up to 2035, which is a considerable period of time if they result in blight to local residents and will require robust management.

Nuance

There is no specific topic area within the assessment of impacts in the ANPS relating to construction. Rather, it is considered within many of the topics alongside operational impacts, and mitigation should apply to both the construction and operational phases of the expansion, particularly surface access and community.

Division

Construction

Impacts of Construction Noise

Action

Protect residents from noise disturbance caused by construction by ensuring that Heathrow's Construction Management Plan complies with good practice and legislation.

Title

Construction activity and The Code of Construction Practice.

Topical Issue

- Proposed 24 hour construction work.
- Study area for noise effects only 300m from construction activity rather than 1km.
- Residents will experience sleep disturbance and impaired cognitive development, (particularly in children), and other negative noise related health outcomes
- increased costs to Spelthorne with managing the next 10 years+ of related statutory duty (ie COPA, s61 applications, noise complaints etc).
- Proposal for a specifically constituted body provided for by the DCO, referred to as the Joint Planning Committee (JPC) to manage section 61 consents.

Evidence

The construction phase will mean an extended period of noisy activity within the Borough. 24/7 working is proposed, and the DCO application will recommend removing powers from Local Authorities to process applications for noisy works outside of the legally permitted times. It is essential that residents retain confidence in Spelthorne to manage these applications to ensure they do not suffer from negative noise related health outcomes.

For example, every request for working outside of the legally permitted hours should be submitted with full understanding of the background noise levels, the sound levels, and propagation tests, supported with proposed mitigation. These should be submitted 21 days prior to the proposed activity. The applicant must also provide full justification as to why these works have to take place outside of the permitted hours.

The Local Authority should retain authority to respond by serving a section 60 notices to limit working hours and noise levels to protect residents.

Nuance

- Environmental Protection Act 1990
- Control of Pollution Act 1974
- BS 4142
- WHO Noise guidelines for community noise

The above legislation and guidance requires an 8 hour period of sleep to be protected from noise disturbance.

Division

Construction

Land Quality

Action

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.

Title

Land Quality – Contamination, Mineral safeguarding, Agricultural Land Quality

Topical Issue

The Preferred Masterplan has not been informed by land conditions, with potentially significant implications for health and environmental impacts. Commitment to compensate local communities for loss of future restoration schemes is weak.

Evidence

At commencement of the Airport Expansion Consultation, intrusive site investigations had only been commenced for some land parcels to the west of the existing Terminal 5 campus. No investigations of land within Spelthorne had been progressed.

Mitigation of land quality impacts totally relies on the CoCP and especially the Materials Management Plan which has yet to be drafted.

The PEIR summarises preliminary screening results of nearly 2000 soil samples and available groundwater and surface water samples. This indicates that already investigations have encountered contaminant levels of polyaromatic hydrocarbons and other hydrocarbons and heavy metals above commercial land use and environmental water quality standards. The significance of these exceedances is as yet unknown and there is no clear timetable for when stakeholders will be engaged on investigation proposals, scheduling and results for their areas.

Nuance

Absence of site investigations to date means that they have not informed any of the masterplan development and that the environmental assessments of the PEIR are currently only based on desktop data. Stakeholders need to be consulted on the site investigation data, risk assessments and interpretation well in advance of the DCO submission. It is currently unclear whether Heathrow will be able to even implement all the necessary intrusive investigations ahead of the current DCO submission timeline. The PEIR foresees that site access may not be available for all of the DCO red line ahead of submission of the Environment Statement at DCO Submission.

The MMP is to be developed for the Environmental Statement and DCO submission, but this is a key document that should be consulted on before DCO submission.

The PEIR details that factual ground investigation reports will form an annex to the Environmental Statement. However, the ES needs to include, and be informed by, appropriate interpretation and risk assessment of the site investigation data as well. With no site specific risk assessments and no remediation method statements available for the ES and DCO submission, this raises concerns about significance judgements and appropriate mitigation.

With respect to the future restoration of Homers Farm, Hithermoor Quarry and Stanwell Quarry the proposed restoration to agricultural land will only be taken into account “where planning permissions indicate that restoration is due to be completed prior to commencement of

construction of the DCO project”. This suggests Heathrow has only proposed compensation and mitigation where restoration is completed prior to 2021, which potentially discounts all three sites in Spelthorne.

Division

Pollution

DRAFT

Airport Drainage and Water Pollution

Action

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.

Title

Water pollution - Airport drainage and pollution control

Topical Issue

Loss of 24 hectares of Green Belt to surface water treatment at Hithermoor and a further 16 hectares of strongly performing Green Belt on the NW Borough Boundary near Mayfield Farm. Significant concerns about impacts to Staines Moor SSSI from both quantity and quality of discharge to River Colne, sterilisation of mineral reserves at King George VI Reservoir due to loss of Hithermoor Quarry, and compromise to Southern Rail access from Staines.

Further development-specific drainage solutions will be required for the construction phase, and land for drainage from new road layouts.

Evidence

Since a biological option was discontinued (on the basis of being unproven technology) Heathrow have developed a trial biological treatment facility to receive flows from the Eastern Balancing Reservoir. A biological treatment option should be reassessed. The facility has to be proven over consecutive winters before it can be adopted as a treatment option – when will the results of the trial be available? The possible implications for quality, land take and cost etc have not been assessed.

The preferred site at Hithermoor was not an original land parcel choice and thus was not subject to evaluation against the other options in the Updated Scheme Report Document 4 Chapter 2 Table 2.9. Spelthorne's strongly performing Green Belt near Mayfield Farm, which provides an 'essential gap' between non-Green Belt developments, is dismissed as having either limited Green Belt functions or no significant Green Belt constraints and scored Green by Heathrow whereas other sites performing important Green Belt functions are scored amber or even red. Assessment of these Southerly sites also ignores historic landfill onsite (S-03) and downplays displacement of formal football pitches (S-04), elsewhere scored amber, red or black. The resultant errors in the BRAG table and Summary Evaluation (Tables 2.09 and 2.10) mean land options to the south west and south are judged more favourably than other options.

Option Family 2 (Treatment to the North) scored better (BRAG Table 2.14) than options with treatment to the south and south west (Options Families 1 and 3), but would require pumping due to gravity drainage not being possible. A reversal to Option 3 as preferred option in para.s 2.5.33 & 2.5.34 has not been fully explained. The assessment refers at para 2.5.48 to competing Masterplan land uses for the south-west area including a point on at-grade transition of the Southern Rail Tunnel, but no explanation is made about how the preferred scheme avoids any conflict or compromise to a Southern Rail scheme.

At paragraph 2.5.61 the site area of the south-west option is given to be appropriate to treat a catchment of 425 hectares but there is no explanation of which catchments this refers to – just new Northern catchment? There is no justification offered of the extent of land take at Mayfield Farm. In bilateral discussions Spelthorne has been told that the northernmost balancing pond and associated footprint for pumping station and equipment may not be needed. This is not discussed in the assessment. The reed beds at land option S02 have been described to the Council as being for treatment of the displaced Spout Lane Lagoon. The extension of Mayfield

Farm to the east of the existing site has not been explained – it is obvious how development in the Western Catchment will generate additional foul water but not why additional surface water treatment is needed as the airfield size there is unchanged. The easterly extension is at the same location as the discontinued option for a new Southern WWTW for foul water.

Nuance

Vertical flow reed beds can achieve higher oxygen transfer rates than other horizontal reed bed systems reducing the required land take and enhancing treatment capabilities. The Updated Scheme Development Report has not considered updating the existing horizontal reed beds at Mayfield Farm to minimise additional land take requirements.

Surface water treatment at Hithermoor is being sold to residents in the Stanwell and Stanwell Moor consultation brochure as 'green space' around the villages to increase publicly accessible open space. In other documents it is portrayed as compensation for loss of other green areas in the community. The reality is that the site will be an artificial engineered environment, with not just reed beds but large areas of hardstanding for the compound and forebay areas, and that there would be no public access with a 2m high bund and security fence. Further, the whole site is likely to require netting to stop bird nesting, and is likely to meet the definition of a large raised reservoir under the Reservoirs Act 1975 (as amended by the Flood and Water Management Act 2010).

Spelthorne has significant concerns about the residual risks raised with Option 3 (para 2.5.55) and in particular the use of Hithermoor, especially the lack of assessment to date on the operations at Hithermoor Quarry and potential sterilisation of mineral reserves at King George VI and discharge from the site into the River Colne (quantity and quality) impacting on the Staines Moor SSSI. Discontinuation options to be applied at the beginning of the assessment included rules 4 and 5 to discontinue any options to watercourses and waterbodies sensitive and compromised by the quantity and quality of discharges. Staines Moor SSSI consists of alluvial flood meadows/ floodplain fen. The citation and rare aquatic flora exist due to the water levels of the groundwater and River Colne. No apparent consideration was made about discharges to the River Colne at this early stage as was the case for other waterbodies.

Division

Pollution

Commitment to Waste Disposal

Action

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.

Title

Waste

Topical Issue

Transportation of >300,000 tonnes of excess Construction, Demolition & Excavation (CD&E) wastes and 600,000 tonnes of hazardous waste by road in Phase 1 of the construction works when the railhead will not be available. Sterilisation of mineral reserves at King George VI Reservoir. Potential acute impacts on availability of CD&E waste processing sites in NW Surrey, and pressure on further extension of other temporary sites across the Borough.

Evidence

The new Colnbrook railhead will not be available until 2023. The Preliminary Outline Construction Traffic Management Plan (POCTMP) makes it clear at para 6.3.6 that “the early years of construction will rely on the road network for deliveries”. However, the peak years for production of excess CD&E wastes and hazardous wastes requiring disposal to off-site landfill are 2022-2023 - when the annual volumes of 111,000 tonnes per year of CD&E wastes and 271,000 tonnes per year of hazardous wastes will be produced (PEIR, Chapter 20, paras 20.10.5 and 20.10.7).

Surrey County Council strongly disagree with proposals set out within the PEIR to disregard aggregate recycling capacity at Hithermoor Quarry contrary to the Surrey Minerals Plan, which would sterilise mineral reservoirs in the King George VI Reservoir.

Heathrow is proposing an agreement with the operator at Homers Farm to leave the site unfilled to 2m below planned finished ground levels to facilitate their proposals for the site. This amendment to the agreed restoration plan needs to be varied and agreed with Surrey County Council.

Nuance

With regards to Hithermoor Quarry, Stanwell Quarry and Hithermoor Quarry it is unclear what mitigation and compensatory provision will be delivered by the Expansion scheme and how local this is to the sites impacted

Insufficient evidence has been provided to indicate that the loss of CD&E waste processing at Stanwell Quarry would be neutralized by provision of additional CD&E waste management as part of the expansion project. Planning permission for the site does not limit waste to only originate from Heathrow (25% does not originate from Heathrow) and the premature closure of Stanwell Quarry and Hithermoor Quarry would make demand across Surrey more acute.

There is no detail about what assumed proportion of hazardous waste and raw materials would leave/ arrive at the site by rail in the transport modelling, and the sensitivities around traffic, air quality and health impacts if the proportions are changed. Similarly vague statements are made about delivery of raw materials – e.g. Construction Proposals Para 4.3.25 – “the use of concrete is proposed to be minimised.... concrete will be delivered by train as much as practicable”.

Division
Pollution

DRAFT

Health & Wellbeing

DRAFT

World Health Organisation (WHO) Wellbeing Thresholds

Action

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.

Title

WHO wellbeing thresholds.

Topical issue

Heathrow is not applying the WHO Europe's guidelines for night noise which states that annual average night exposure should not exceed 40dB (night covers at least 8 hours). Nor are they applying the guidelines for annual average day exposure which should not exceed 45dB.

Evidence

The WHO guidelines are based on the average sound pressure level over all days, evenings and nights in a year. There is a specific guideline for night time which is more stringent. Firstly, Heathrow is using LAeq's which measures continuous sound during a stated time interval starting and ending at a particular time, and a particular point. This therefore does not cover the scenarios when there may be fluctuations in noise levels which would be captured by the WHO guideline. Secondly, Heathrow is using higher decibels in terms of any noise compensation. It is applying 77dB during the day and 66dB at night for residents to be able to claim a package for unacceptable effects and 63dB during the day and 55dB at night where there are significant effects.

The Government is consulting on reducing the above threshold in its Aviation 2050 strategy. This would reduce the 63dB to 60dB and 55dB to 54dB. Even though this is still not sufficient in the view of Spelthorne, Heathrow has not even sought to apply this lesser criteria now in the knowledge that it will almost certainly be in place once the scheme progresses to DCO. It is too late to leave it until that point.

Nuance

The WHO Environmental Noise Guidelines for the European Region 2018 strongly recommend that in order to prevent adverse health effects the average day time noise exposure from aircraft should be below 45dB Lden. In a similar vein, the guidance strongly recommends that in order to prevent adverse effects on sleep, the noise exposure from aircraft should be below 40dB Lnight., as night-time aircraft noise above this level is associated with adverse effects on sleep. Above these levels the Guidance is "confident that there is an increased risk of adverse health effects".

Airports NPS, paragraph 5.68, states:

"Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- where possible, contribute to the improvement of health and quality of life."

Division

Health

Protecting Residents Health and Communities

Action

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.

Title

Protecting the health of residents and communities

Topical issue

Chapter 12 Health, reports that the noise assessment identified that significant adverse effects on health and quality of life would be caused during construction (day, evening and night) in the communities of Stanwell and Stanwell Moor, and in other non-Spelthorne areas.

Evidence

Chapter 12 (12.10.227) states “Direct and indirect influences on health, physical and mental health and wellbeing outcomes will be expected. These will predominantly relate to changes in wellbeing and the burden of disease within the population, though the potential for contributions to changes in mortality (for example due to noise and air pollutant exposure) are also noted. This includes the onset of new health conditions or health related states, changes in existing health conditions and changes to day-to-day functioning. The exposure can be characterised as moderate or high over a medium or long period. Given the urban context the population is predominantly in close proximity to the construction related sources and baseline conditions (such as ambient air quality) may already be approaching regulatory standards”.

Chapter 12 (12.10.232) states “Noise: Based on the literature reviewed, the strength of evidence is strong for a direct causal relationship between noise disturbance and health outcomes. The evidence is strongest for annoyance, cardiovascular, learning disruption and sleep disturbance effects, particularly linked to road transport. There is little evidence for adaptation to elevated transport related noise levels”.

Chapter 12 (12.10.227) states “Environmental measures and mitigation may be required in addition to (and developed in recognition of) the compensation policies that Heathrow has regarding property and noise, and so strategies will be developed to deliver holistic mitigation measures across communities, drawing on multiple environmental aspects, embedded and additional measures to reduce perceived significant effects on ‘community life’ in these communities. A suite of physical and nonphysical mitigation and environmental measures will be developed for each potentially affected community to mitigate effects on community sustainability, viability, integration and cohesion”.

Nuance

From Chapter 12, the key environmental measures were not in place prior to when the PEIR was undertaken. The PEIR would not have been able to assess how these policies and strategies might mitigate impacts, it would therefore have been difficult to accurately assess the impact of these factors. This is important because it is essential that the findings of PEIR influences and drives the development of the key environmental measures (both embedded and additional measures) to ensure they maximise opportunities to mitigate negative health impacts as well as maximise any potential positive impacts.

Division

Health

Protecting Residents Health and Communities during Construction

Action

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.

Title

Financial support for LA monitoring and enforcement of Heathrow construction works

Topical issue

- Negative health outcomes (in relation to noise, air quality, light pollution)
- Increased strain on health services, e.g. reduced access to public services, GP appointments, social care
- Increased strain on road network and public transport, leading to a reduction to Active Travel affecting opportunities for healthy lifestyles
- Reduced road safety due to temporary changes in road layout
- Increase in crime, anti-social behaviour and communicable disease associated with transient populations
- Lack of outside recreational space
- Reduced community cohesion
- Flood risk

Evidence

- The approach to car parking for the construction workforce is to provide temporary parking facilities located at clusters, from where the shuttle bus system will transport workers to their site offices or workplaces (Sites not yet confirmed).
- Approximately 1,350 construction workers will be accommodated on-site or in project-sponsored accommodation in the vicinity of Heathrow.
- The EIA does not present modelling which could be used to predict change that exceed thresholds from the scientific literature or set by regulators, as required.
- Construction activity, increased traffic and workforce documented in PEIR.
- Requirement for land (temporary and permanent) to construct and operate the DCO Project, including displacement of existing land uses and changes to local traffic routes in PEIR.

The draft Control of Construction Plan is a critical embedded measure to protect health outcomes during the development phase. Heathrow should be made aware of the necessity to comply with the Control of Pollution Act throughout the construction phase, and the need for s61 applications for any activity not covered by this. To this end significant resources will be needed by Spelthorne to enforce this, both proactively (s61 application assessment and liaison with contractors) and reactively, (s60 notices). Heathrow should therefore compensate Spelthorne to allow for one full time officer to manage this workload for the length of the construction phase.

In the baseline data used, there are concerns that details relating to health status, demographic composition, deprivation issues and the priorities of healthcare providers in Spelthorne have not been suitably captured. Therefore the PEIR has not accurately identified the significance of effects.

Nuance

There is no specific topic area within the assessment of impacts in the ANPS relating to construction. Rather, it is considered within many of the topics alongside operational impacts, and mitigation should apply to both the construction and operational phases of the expansion, particularly surface access and community.

Division

Health

DRAFT

Airspace

DRAFT

Independent Parallel Approaches

Action

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.

Title

Independent Parallel Approaches (early growth)

Topical Issue

Heathrow will request an early release of 25,000 ATMs per year to be made available once structural alterations have been made to facilitate the additional ATMs. The plans for this early growth include the use of IPA to allow arrivals on both existing runways before the third is operational. This would see new routes over Spelthorne with additional noise at sensitive times of the day.

Evidence

The final airspace design is expected to offer benefits to the borough and beyond as a result of less congested airspace, removal of the stacks that hold departing flights at lower altitudes and increased alternation and therefore respite. The plans for early growth would see the increase in flights without these benefits. Of particular concern are the plans to introduce IPA to allow greater frequency of arrivals on both existing runways in the early morning peak time. Whilst the runways are already used in this way, IPA would mean staggered arrivals on each runway are not necessary and both can be used at the same frequency, independently from each other's approach. To facilitate IPA, a new route is required for one approach so that arriving aircraft are not in close proximity until close to the runway. For Spelthorne, the IPA route on approach to the southern runway would cut across our borough, resulting in greater frequency of noise from arrivals, including some newly overflown areas, at a sensitive part of the day (6am – 7am) and without mitigation. Proposals that worsen the current situation for residents and introduce further potential health impacts proposals are unacceptable and should not form part of the DCO submission.

There is no national policy basis within the Airports NPS to allow for early growth by increased intensification of the existing two runways and we are very concerned that this issue will not receive sufficient attention within the overall DCO process for expansion.

Nuance

Consideration of early growth is not included within the ANPS. However, it makes clear that it expects Heathrow to bring forward appropriate compensation to control and reduce noise impacts, which will include noise insulation programmes. Within Heathrow's scheme, there is no detail of any mitigation provisions for IPA routes and early growth.

Detail/Division

Airspace

Surface Access - Transport

DRAFT

Local Road changes

Action

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.

Title

Impact of changes to local roads in Spelthorne.

Topical Issue

Additional traffic and congestion from construction vehicles and passenger journeys, resulting in impacts on noise, air quality, local traffic movements and general blight on our communities.

Evidence

By moving the Airport Way and the Southern Perimeter Road further south and increasing capacity to three lanes in each direction, there will be greater impact on our communities in Stanwell Moor and Stanwell Village due to increased noise and air pollution. Changing the focus of traffic to the south west of the airport from the north will result in additional vehicle movements using the Crooked Billet junction with the A30 from users of the A3044, which is frequently congested. The proposal to move the petrol filling station, which includes HGV facilities, from the Southern Perimeter Road to the eastern side of Stanwell Moor Road north of the Park Road signalled junction would result in drivers having to travel south along the full extent of Stanwell Moor Road to the Crooked Billet junction to turn if they wish to head north as there is currently no right turn available due to the central verge. Even worse would be HGVs and other traffic turning into Park Road and travelling through Stanwell to reach the Southern Perimeter Road, causing blight to the village. This impact is not considered within the AEC documents and barely features at all, especially in the Stanwell and Stanwell Moor focused documents, and on some plans it is only indicated as 'airport supporting development', even though Heathrow has informed Spelthorne it is the relocated filling station.

Nuance

The following extracts from the ANPS are relevant:

- 5.5 The Government's objective for surface access is to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport maximised as much as possible. This should be delivered in a way that minimises congestion and environmental impacts, for example on air quality.
- 5.6 A Northwest Runway at Heathrow Airport will have a range of impacts on local and national transport networks serving the airport, during both the construction and operational phases. Passengers, freight operators and airport workers share the 134 Airports Commission: Final Report, p4 48 routes to and from the airport with other road and rail users, including commuters, leisure travellers and business users. Without effective mitigation, expansion is likely to increase congestion on existing.

The proposals included would result in enlarged roads closer to local communities and additional traffic, including during construction, on the Borough's roads and impacting on congested junctions such as the Crooked Billet. The concentration of parking increases the focus of traffic towards the south west of the airport, negatively impacting on the Borough.

Division

Surface Access – Transport

DRAFT

Need for cargo link – Southern Perimeter Road

Action

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.

Title

Lack of a cargo link over or under the Southern Perimeter Road

Topical Issue

There are already HGV movements associated with moving cargo from businesses directly south of the Southern Perimeter Road into the airport, which would increase with expansion, causing additional traffic, air pollution and noise.

Evidence

The lack of a cargo link under or over the Southern Perimeter Road results in significant numbers of HGV journeys along the highway in both directions just to move goods between the on-airport cargo facilities and the off-airport freight businesses south of the Southern Perimeter Road, such as Dnata. With expansion, freight operations would increase. Much of these journeys could be eliminated by a non-road cargo link, taking many HGVs off the road. Spelthorne has raised the need for a cargo link in previous consultation responses and engagement with Heathrow. Heathrow's pre-application material shared with Spelthorne and other local authorities on preparation of the Surface Access Strategy (SAS) included reference to 'new non-road cargo links' under its plans for a Traffic Demand Management Strategy relating freight. The SAS, subject to the current AEC, does not include any commitment to this, despite acknowledging at paragraph 3.7.22 that it was a key issue from previous consultation, and it does not feature in the draft Masterplan. Without inclusion within the DCO, there is no commitment that the link would ever be delivered, despite the clear benefits it would bring in terms of impact on the environment. In the SAS, Heathrow has assumed their proposals can achieve "a reduction in total freight-related vehicle movements of between 20% (lower) and 28% (higher)". This is "calculated on the basis that there is greater scope for consolidation to impact on import cargo collections, with an estimated range of impact of 20-40%. As there is less scope to impact on export cargo deliveries, we have assumed a 10-15% range" (paragraphs 3.7.43 and 3.7.45 of the SAS document). No evidence is provided to support these numbers, yet Heathrow confirm in the SAS (paragraph 3.7.4) that freight vehicle trips are incorporated within and subject to the overall No More Traffic (NMT) pledge. A non-road cargo link would offer a realistic measure to assist Heathrow in achieving a meaningful reduction in freight movements.

Nuance

Extract from Spelthorne response to CON1:

Land use comments

- 11.3 Any development [of land surrounding the existing off-airport cargo area] would need to ensure there was no inappropriate HGV routing through Long Lane, Short Lane and Stanwell Village. The site does benefit from good road links to the Southern Perimeter Road from the north east approach – as such any access should be from Bedfont Lane only. This larger area of commercial development would benefit significantly from improved access to the airport to reduce vehicular movements. There is suggestion about the possibility of a Pod/shuttle link between this off-airport cargo area and the on-airport cargo facilities to the north of the Southern Perimeter Road. The Heathrow consultation documentation indicates that moving goods to and

from off-airport warehousing represents a third of all Heathrow cargo related trips, so there is very real potential for significant air quality benefits if such a low emission link was taken forward. These benefits are considered sufficiently great that such a link must be an integral part of the cargo solution for this area.

The following extracts from the ANPS are relevant:

- 5.5 The Government's objective for surface access is to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport maximised as much as possible. This should be delivered in a way that minimises congestion and environmental impacts, for example on air quality.
- 5.6 A Northwest Runway at Heathrow Airport will have a range of impacts on local and national transport networks serving the airport, during both the construction and operational phases. Passengers, freight operators and airport workers share the 134 Airports Commission: Final Report, p4 48 routes to and from the airport with other road and rail users, including commuters, leisure travellers and business users. Without effective mitigation, expansion is likely to increase congestion on existing.
- 5.8 It is important that improvements are made to Heathrow Airport's transport links to be able to support the increased numbers of people and freight traffic which will need to access the expanded airport, should development consent be granted.

The NPS seeks improvements to surface access and improvements to support increases in traffic arising from expansion, including freight. Spelthorne has raised this issue with Heathrow in previous consultations and Heathrow had offered some indication that a cargo link could form part of its Surface Access Strategy, but it does not feature in proposals subject to the current consultation.

Division

Surface Access - Transport

Modelling shortfalls and lack of engagement

Action

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.

There must be opportunity for public and stakeholder feedback on the “third phase” of transport modelling.

Title

Modelling shortfalls / engagement on modelling approach

Topical Issue

The surface access targets are:

- To achieve a public transport mode share of at least 50% by 2030 and at least 55% by 2040 for passengers;
- From a 2013 baseline level to achieve a 25% reduction of all staff car trips by 2030, and a reduction of 50% by 2040;
- The “No More Traffic” pledge.

These are ambitious targets. Heathrow say they can meet these targets, and say this claim is supported by transport modelling. They say the models used have been calibrated and validated. No evidence of this is provided.

Heathrow has not provided sufficient information to justify their forecasts. Heathrow has not justified in a believable way that they can meet their surface access targets and the no more traffic pledge.

Issue – surface access targets will not be met. This would mean excessive traffic in Spelthorne with consequences for congestion and air quality.

Evidence

Heathrow has managed to produce documents of many hundreds of pages covering their transport modelling, with very little useful content about the modelling process or results.

Whilst we note that Heathrow say the surface access proposals and transport modelling will be revised for the Transport Assessment (TA) to accompany the DCO, it appears the transport modelling documented to date is not fit for purpose for such important “nationally significant infrastructure” and “one of the largest infrastructure projects in Europe”.

In the PTIR (vol 1), Heathrow states that “this phase of modelling has informed the development of the SAP and has been used to assess its effectiveness in achieving the requirements set out in the Airports NPS” (paragraph 6.6.4), “These are preliminary forecasts that are based on the best information that is currently available” (paragraph 6.6.5), and “A third phase of modelling will be undertaken prior to the submission of the DCO application” (paragraph 6.6.6).

Given the extreme lack of detail and quantitative information provided, we must assume the modelling is premature and/or not fit for purpose.

On further modelling work for the TA, Heathrow states “Work to update and refine the existing surface access modelling tools is already underway” (paragraph 10.1.3 in the PTIR vol 1). They do not say what they are doing.

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.

There must be opportunity for public and stakeholder feedback on the “third phase” of transport modelling.

Heathrow has not provided sufficient information to justify their forecasts. Heathrow has not justified in a believable way that they can meet their surface access targets and the no more traffic pledge.

Nuance

The mode share targets for passengers and colleagues are found in the Airports National Policy Statement, paragraph 5.17.

Division

Surface Access -Transport

DRAFT

Spelthorne opposes the Southern Parkway

Action

Spelthorne objects to the location, quantum and massing of the Southern Parkway and has concerns with Heathrow's overall parking strategy

Title

Impact of a Southern Parkway at Stanwell

Topical Issue

- Green Belt land-take without justification;
- Location of Southern Parkway directly contradicts Heathrow's stated aim to reduce traffic circulating the airport;
- Colleague parking constraint could lead to colleagues parking on local roads outside the airport boundary;
- Measures to prevent parking on local roads could adversely impact parking availability for Spelthorne residents and visitors to the borough;
- The phasing of the Southern Parkway in advance of the Northern Parkway would further exacerbate impacts on local communities.

Evidence

The Southern Parkway (22,000 spaces) is meant to be accessed from (the upgraded) J14a of the M25. Presumably access will also be possible from local roads. We need to see the detailed network modelling.

The indicative phasing (chapter 8 of the Preferred Masterplan, and paragraphs 3.4.49 and 3.4.50 of the SAP document) shows the Southern Parkway complete by 2035, but the Northern Parkway (24,000 spaces) not complete until the end state, around 2050.

(SAP paragraph 3.4.26) "Providing the right amount of passenger car parking to encourage people who will not use public transport to travel to drive and park [instead of kiss and fly] is one of the tools within our Surface Access proposals that will help us manage traffic levels."

However, no methodology for calculating the optimum number of car parking spaces is given.

In the SAP document, Heathrow discuss the balance between park & fly and kiss & fly. Park & fly = 2 vehicle trips, Kiss & fly = 4 vehicle trips (usually). Heathrow want to get the right balance and, between the two, park & fly is preferred. They don't want to reduce passenger parking and push people to kiss & fly / taxi use, thus generating more car trips. (SAP paragraph 3.4.26) "Providing the right amount of passenger car parking to encourage people who will not use public transport to travel to drive and park is one of the tools within our Surface Access proposals that will help us manage traffic levels." However, no methodology for calculating the optimum number of passenger car parking spaces is provided.

Passenger car parking

The proposed car parking uses some Green Belt but Heathrow don't justify this.

Drivers go to the car park for the terminal they want to go to. This means that some have to go all round the periphery of the airport to get to their car park. Instead car parks should be situated on approach roads so that people go to the car park nearest to where they are

coming from and all car parks should be linked to all terminals. This would reduce car travel around the periphery of the airport. Heathrow's solution is in direct violation of their stated aim "to reduce traffic circulating the airport" (SAP paragraph 3.4.18).

Car parks should be on each approach road and linked to both CTA and T5X to minimise traffic circulation round the airport.

Heathrow say that "more airport passenger parking does not necessarily equate to more traffic" (SAP paragraph 3.4.20) which assumes that kiss-and-fly would always be the alternative (kiss-and-fly involving more car trips), whereas kiss-and-fly is not always their alternative.

In the SAP (paragraph 3.4.26) Heathrow states, "If we simply reduce passenger car parking, we are likely to push some passengers towards kiss-and-fly and taxi and private hire use, which is less efficient and will generate more car trips". This is Heathrow's justification for the level of parking needed but the statement assumes that the VAC is zero (which it isn't), that there are no additional public transport measures (which there are), etc. Therefore Heathrow has not justified the level of parking needed. If the other toolkit measures are factored-in many more passengers will use public transport and fewer car parking spaces would be needed. The proposed quantum of parking should be considerably reduced.

For a given level of parking space provision, Heathrow raises more revenue from passengers than they could from colleagues so they want to use all available spaces for passengers.

Colleague car parking

Heathrow assumes that parking constraint will switch colleagues to PT and active modes, because the cost of regular taxi trips would be prohibitive. This links to the comments we have made about the behavioural responses in the transport models. If mode choice is all that's available to these colleagues without parking spaces, then of course the model will say they will switch modes. Realistically, what else might they do? And, what about first/last mile travel between home and PT?

Heathrow has not considered the emerging modes such as one-way car sharing schemes.

This assertion is entirely unsubstantiated and the entire SAS for colleague parking rests on it (SAP paragraph 3.4.33): "Our analysis shows that locating park and ride facilities further from the airport is the best solution to addressing demand for travel to and from Heathrow". Why is it the best? Is it because Heathrow raises more revenue from passengers than they could from colleagues? Is it because colleagues would count in the "no more traffic" pledge as coming by public transport, making it easier to meet this target? Or is it because Heathrow doesn't want to provide a bus service from colleagues' homes – they can just provide it for the last few miles at considerably reduced cost? In fact the 'best' solution is to provide a non-car alternative which is sufficiently attractive and a car alternative which is expensive and unattractive so that they don't want to go by car.

The SAP asserts that (paragraph 3.4.33) "Park and ride generally abstracts demand from public transport". This is false. Park and ride generally abstracts demand from car. This assertion is used to justify why their parking spaces should be remote from the Heathrow "no more traffic" cordon.

Paragraph 3.4.31 of the SAP document states "We will also work with local authorities to introduce measures to seek to prevent colleagues from parking on-street around the airport, and to improve enforcement of existing restrictions. We will work with Heathrow employers to discourage colleagues from parking on-street."

Is it fair that local authorities should have to introduce such measures? What form will they take? What effect will they have on residents and other (non-airport) visitors?

If new parking restrictions are required to deter colleagues from parking in Spelthorne, then detailed modelling and analysis is required, to determine the form they should take; the impact on borough residents, visitors, and the local economy. This is critical in advance of the DCO.

As we have noted elsewhere, the transport modelling suite does not appear to be suitable for modelling the behavioural response of parking off-airport.

Parking powers

Heathrow is seeking additional powers in the DCO to provide control over all car parks and all parking management. This is accompanied by the bland justification that “without a change in the way that tenanted parking is managed, our assessments indicate that it will be extremely difficult to reduce colleague car trips sufficiently to achieve our vision and meet the NPS targets” (SAP paragraph 3.4.58).

“To ensure we have sufficient control over car parks”, Heathrow is seeking powers of acquisition of tenanted car parking within the site in the DCO (SAP paragraph 3.4.59) which they can use for parking or for other purposes.

They are seeking additional DCO powers to control parking in non-Heathrow car parks and to issue a Workplace Parking Levy. Who gets the money?

Nuance

From the ANPS:

- 5.17 Any application for development consent and accompanying airport surface access strategy must include details of how the applicant will increase the proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040 for passengers. The applicant should also include details of how, from a 2013 baseline level, it will achieve a 25% reduction of all staff car trips by 2030, and a reduction of 50% by 2040.

Division

Surface Access -Transport

Southern Rail Access to Heathrow

Action

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 delivered before the third runway becomes operational.

Title

Heathrow Southern Rail Access and SLR

Topical Issue

There is a lack of real commitment to Heathrow southern rail access. We do not believe expansion is really credible without it.

Evidence

Heathrow's expansion plans are stated to be independent of, but compatible with, Western and Southern Rail links, both of which would be subject to their own DCOs. Heathrow claims the "Assessment Case" (a forecast model scenario without Western or Southern Rail links) shows they can meet their targets. As we have explained elsewhere in our Consultation Response, there is insufficient evidence to support this claim. The figures and analysis presented in paragraphs 2.6.9 to 2.6.20 of the SAP document imply Heathrow will meet their passenger PT mode share targets by simply setting the vehicle access charge to the required level. We are not convinced by the evidence submitted to date that this will be the case. The "Expected Case" (forecast model scenario with both Western Rail and Southern Rail links) is not fully refined (paragraph 2.6.20).

If no Western or Southern rail is in place by 2030, Heathrow propose coach services from Staines (and elsewhere) to build public transport demand ahead of future rail links (paragraph 3.2.169 of the SAP document). Coach services would not be able to carry as many passengers as the proposed Southern Light Rail (SLR). Mode perceptions are different.

In section 3.3 of the SAP document (on colleague travel proposals), it is noted that some wards in Spelthorne have "particularly high number of colleague car drivers". SLR would be a way to reduce this.

Southern Rail Link to Heathrow

Heathrow is working on the assumption that if there are train there will be 4 trains per hour (tph) Waterloo to Heathrow stopping at Staines, Feltham, Twickenham, Richmond, Clapham Junction. There would also be 4tph T5 to Woking with 2 tph continuing to Guildford and 2 tph continuing to Basingstoke. They don't say how this will be achieved with already congested train paths into Waterloo. This is not considered a credible solution.

First/ Last mile measures are in association with Western Rail link but Heathrow do not identify what they are, where they will go and what ridership they will attract (SAP paragraph 3.2.148). They are silent on a Southern rail link.

In LASAM, mode 2 (standard rail) does not currently exist at Heathrow. It is not clear what mode choice coefficients Heathrow is using for WRLtH and SRLtH.

Spelthorne is calling for a light rail link to Heathrow from Staines-upon-Thames. Light railway has many benefits over traditional heavy railway, both in general and specifically for Spelthorne. It will improve access to the airport for Spelthorne residents, bring economic benefits to Staines Town Centre, and can be delivered with minimal impacts on Staines Moor.

The SLR scheme is a straightforward and highly affordable solution at under one third of the cost of traditional heavy rail solutions. Entirely funded by private investment, it is also the only scheme 'on the table' which will truly be at nil cost to the taxpayer.

Light rail solutions have been tried and tested the world over, from Vancouver in Canada, whose light rail is now three decades old, to Beijing in China. At full capacity the SLR will be able to carry 84 million passengers per annum. As a stand-alone solution, it will not affect the carrying capacity of the current rail network and can grow with the airport because it can link up sections of the airport in a way that heavy rail never can - helping Heathrow to reduce private transport, and improving air quality by providing a modal shift from road to rail.

SLR can be up and running long before the completion of the third runway, much quicker than heavy rail, offering the quickest solution to the airport's public transport needs. The SLR station will link with the existing railway station in Staines-upon-Thames, providing seamless connectivity. Trains will run every six minutes and take just seven minutes to reach the airport which traditional rail solutions cannot compete with. Other advantages include no premium rate fares (it would be in Zone 6), no Government access agreements and no impact on Staines Moor.

The SLR will put Staines-upon-Thames on the map as a centre for business growth and investment. This releases huge untapped potential and brings significant economic opportunities. The Enterprise M3 LEP strongly support the regeneration benefits the scheme has for Staines and Spelthorne.

Nuance

Para 5.7 of the ANPS states:

“The Airports Commission identified three major rail improvements which would support a new Northwest Runway at Heathrow Airport. These were Crossrail, a Western Rail Link to Heathrow and Southern Rail Access to the airport. Notwithstanding the requirements for the applicant's assessment set out below, Government has supported, or is supporting, all three of these schemes subject to a satisfactory business case and the agreement of acceptable terms with the Heathrow aviation industry. Any Southern Rail Access to Heathrow is at an earlier stage of development and, subject to an acceptable business case and obtaining planning consent, should commence operations as soon as reasonably practicable after a new runway has opened.”

Division

Surface Access - Transport

No more traffic pledge

Action

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.

Title

Definition and monitoring of Heathrow’s “no more traffic” pledge

Topical Issue

- Construction vehicles (for works authorised by the DCO) are excluded from the pledge. The large amount of construction traffic that will be generated, and the considerable timescale for expansion, will bring substantial traffic, noise and air quality impacts to local residents. By excluding them from the pledge, HAL have no incentive to minimise them.
- The pledge definition uses number of vehicles, so if Heathrow’s surface access toolkit measures reduce the number of car trips, HGV trips could increase. HGV have a bigger impact on people’s perception of traffic, pollute more and need more road/ junction capacity.
- Through traffic is excluded from the pledge. In future, colleague escort trips or passenger kiss & fly trips might be counted as through traffic, especially if they are trying to avoid the VAC. This makes it easier for Heathrow to technically meet the definition of the pledge when there is in fact additional airport traffic.
- There “may be localised traffic increases on particular roads”. We believe there will be a big effect in Spelthorne.

Evidence

The “no more traffic” pledge is defined in the SAP document, starting at paragraph 2.6.37. It is measured using AADT (annual average number of daily airport-related vehicle trips to and from the airport) with a 2019 baseline.

Further detail on delivery, monitoring, and enforcement is given from paragraph 4.3.31 to 4.3.44. They are using ANPR cameras for measurement. The baseline boundary is shown in graphic 4.4. It would be useful to know the accuracy of Heathrow’s ANPR system and whether there is potential for under-reporting.

The boundary excludes all the other sites which Heathrow operate such as the immigration detention centre plus the other related industries such as the A4 adjacent hotels. The Boundary is defined as “land accessible by Heathrow controlled roads” (SAP paragraph 2.6.40). For some reason all TfL roads are excluded from the definition of Airport Boundary (footnote 52 to Graphic 2.34)

Construction vehicles (for works authorised by the DCO) are excluded from the pledge. Given the amount of construction traffic that will be generated, and the considerable timescale for expansion, we do not agree that these vehicles should be excluded.

Scheduled buses and coaches are excluded from the pledge.

Through traffic is excluded from the pledge, where through traffic is any vehicle that doesn’t access a terminal, cargo, operations, or parking area. Is it therefore possible that colleague escort trips or passenger kiss & fly trips might be counted as through traffic? Particularly in

future when such trips might try to avoid the road user charges? This links to our comments about the behavioural responses in the transport models, and the need for Heathrow to undertake detailed, fit for purpose, transport modelling.

Heathrow is clear that there “may be localised traffic increases on particular roads” (paragraph 2.6.56). We need to know where and to what level – this information is not provided. We believe the current strategy would lead to a big increase in traffic in Spelthorne.

Heathrow says the NPS pledge (the Pledge) relates to the “annual average number of airport related trips”. The NPS makes no mention of annual average either – this is Heathrow’s interpretation and others may be more appropriate such as AM peak. Heathrow average across vehicle types which means they can have more heavy goods (HGV) if they have fewer car trips (which they do). HGV have a bigger impact on people’s perception of traffic, pollute more and need more road/ junction capacity so a more equitable definition could be to have no more HGV, no more cars, etc.

Nuance

Para 5.38 of the NPS requires HAL to continue to strive to meet its public pledge to have landside airport related traffic no greater than today. Plans to meet mode share targets should be regularly reviewed.

Division

Surface Access -Transport

Active Travel Proposals

Action

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.

Title

Active Travel and Green Loop

Topical Issue

A well-developed hub and spoke network is to be welcomed as a means of influencing modal shift but there is a danger that without a fully worked up scheme which has been subject to discussion and agreement with the local authorities concerned the benefits envisaged will not be realised.

Evidence

Discussion on active travel and the benefits it can generate are set out in Volume 4 of the PTIR and it is clear that for each of the four sectors identified around the airport there is the potential to increase the modal share and absolute numbers of those choosing to cycle. However, even where a particular route has been identified it is caveated with the phrase "proposals still under consideration". (para 3.3.28) Although "potential spokes" are to be discussed and agreed final details will not be available until DCO submission.

There is a lack of detail on how active travel routes will be integrated with proposals for facilities for recreational cycling and walking within the identified Green Loop areas. In some locations active travel and recreational route are shared whereas in other places they are separate routes.

There is a lack of evidence as to how cycle lane provision along new roads (eg diverted A3044) will be connected with, and complement, the hub and spoke network. The proposals for connecting routes where they have to negotiate the major point of severance at Junction 14 are not fully detailed and appear to provide a less than optimum solution in favour of cyclists and pedestrians.

There has been no evidence as to why a fully segregated bridge for active travel and recreational routes crossing of the M25 south of Junction 14 could not be provided. Given the major severance in this area and the additional construction and other activities located close to Junction 14 the provision of clearly defined and segregated routes would represent a significant benefit and legacy for local residents and colleagues.

Nuance

There is no specific topic area within the assessment of impacts in the ANPS relating to active travel but there is reference to health benefits of new and improved infrastructure (para 4.71) and details of the increased proportion of journeys made by cycling is required (para 5.17).

Division

Surface Access – Transport

Parking

DRAFT

Controlled Parking and Traffic Management

Action

Heathrow to fund the implementation and enforcement of controlled parking zones, invest in alternative sustainable transport measures and implement local solutions.

Title

Controlled Parking and traffic management

Topical issue

A large amount of colleague, passenger, HGV and private hire vehicles will drive through and park in residential roads in the vicinity of Heathrow, where parking restrictions do not exist, specifically in Stanwell Moor and Stanwell, but potentially further beyond in areas potentially served by Heathrow shuttles and express coaches. There is also potential for construction workers to park on local roads if sufficient parking is not accommodated within the construction sites.

Evidence

Colleague parking

According to the consultation documents, there were 47,700 colleague car trips in 2013, and that number increased to 88,676 in 2017. Heathrow has the Airport NPS target to achieve a 25% reduction on the 2013 figure by 2030, and 50% on the same figure by 2040.

Heathrow's proposed new Southern Parkway will provide 40,000 spaces, accounting for 62.5% of the total car parking facilities for customers and colleagues. The South and South-West corridors have a total of 6,443 colleagues living within it, meaning a current percentage of 8.89% of colleagues (as of 2017), but with the forecast increase of 30.39% in colleague numbers by 2030, it is impossible to predict how greater the percentage of colleagues living in these corridors may become.

Heathrow is failing to provide significant measures to address the comparably large reliance of these corridors in driving commutes (these corridors have over 70% share of drivers in colleagues, compared to the 40% average in the other corridors in the East and North East that are served by a comprehensive public transport network). Heathrow only proposes to indirectly work with operators to increase bus frequencies and operating hours as a means to address the increase in demand and reduce the amount of driving trips to Heathrow, and provides no concrete measures that are independent from third-parties.

Concern is also raised over potential parking for construction workers on local roads near sites CS10 and CS11. Little detail has been provided on the layout of these sites and how much parking will be accommodated. The Construction Proposals consider that most workers will commute and many will be using public transport but insufficient evidence has been provided to demonstrate this will be the case. Public transport to the south of the airport is unlikely to support 24/7 working without investment from Heathrow. If there is not a reliable PT service or shuttle buses from nearby transport hubs, construction workers will use their cars and if there is insufficient parking within the sites they will use local roads.

Passenger parking:

The consultation proposes a strategy that creates an effective significant shift in parking from the North to the South, including a large share of the public parking provided by Heathrow in the Southern Parkway, as well as the introduction of an HGV area and a Taxi Feeder site. This significant shift is reflected on the projections laid out in PEIR Volume 6, where Spelthorne appears as one of the few locations where there is a significant increase in traffic

as a result of the Project Scenario. Stanwell and Stanwell Moor further already suffer historically from valet parking using unrestricted residential roads for long term parking of customer cars, as well as private hire vehicle parking in the area. This consultation presents a scenario that will amplify these historic issues by clustering a significant percentage of airport parking, shuttle services, HGV areas and taxi feeder sites in these areas, without presenting adequate measures to mitigate and/or compensate the impact caused directly by them. It is essential that Heathrow funds the implementation and management of a controlled parking zone in these areas.

Nuance

The Surface Access provisions in the NPS are relevant but not go to the detail of controlled parking zones. However, this is an obvious and practical requirement as a result of Heathrow's surface access strategy and proposed location of a parkway in a residential area. The impacts are also within the social adverse impacts and the community compensation provisions.

Division

Parking

DRAFT

Location of Parkways

Action

Maintain existing cap on parking spaces from Terminal 5 inquiry and reconsider approach to consolidated parkways in two locations.

Title

Approach to and location of parking to serve the expanded airport.

Topical issue

The location and concentration of parking to the south west of the airport will have a significant detrimental effect on the quality of life of the communities in proximity to the proposed parkway. Spelthorne will also be negatively affected by the additional traffic from those seeking to access the Parkway, especially if and when the M25 is congested and drivers attempt to access it from other directions.

Evidence

The scale and quantum of car parking proposed within the Masterplan demonstrates that the expansion of Heathrow anticipates a continued reliance on the private vehicle to access the airport and no real ambition to shift traffic movement to sustainable modes. We consider there to be insufficient justification for the number of spaces that will be delivered, which is vastly greater than the cap of 42,000 spaces imposed by the Terminal 5 planning decision. This cap must be preserved with the expansion. Heathrow proposes consolidating off-airport parking currently outside its control that was not included within the 42,000 spaces in order to inflate the number of spaces delivered by the Masterplan to 52,500 spaces, whilst alleging it is not 'significantly increasing' the number. Over 12,000 spaces are currently tenanted and do not contribute to the cap, yet the majority of the number is being absorbed into Heathrow's proposals. If the argument is that there is no increase in parking when considering Heathrow's controlled spaces and tenanted spaces, how will future tenanted spaces be prohibited? Can removing the cap or raising it be justified when there is a 'no more traffic' pledge by Heathrow? In the Surface Access Proposals (SAP) at 2.3.30 it states: 'The number of airport-related off-site parking spaces has reduced to around 4,000 as the largest of these, the Purple Parking site at Southall Gasworks, has undergone redevelopment and was closed in 2017. This has resulted in the loss of around 5,500 off-site spaces, which are not planned to be reprovided'. If the airport has operated without these spaces since 2017, why are the 5,500 spaces still counted in the existing parking totals, if not to inflate the number of future spaces being proposed? Where is the evidence that the demand for these 'lost' spaces justifies reprovision in the Masterplan?

We believe there to be financial motives for Heathrow to operate all the parking in view of the charges this would attract. Spelthorne has yet to be convinced that the strategy to reduce 'kiss and fly' vehicle movements and incentivise passenger parking through the charging regime will achieve modal shift. An easily accessible parkway with a rapid transit system into the central terminal area could encourage more private vehicle journeys rather than use of public transport, even if the charges were high.

Spelthorne has objected consistently to the consolidated parking approach, which saw the identification of just two sites to accommodate the majority of spaces within the parkways. We consider a dispersed approach would result in a more equitable apportionment of Heathrow traffic around the airport and less impactful forms of development. The Northern Parkway is now not due to be constructed until later in the phasing once the existing surface parking south of the Bath Road is no longer operational so this will increase the concentration of traffic to the south, coming from Junction 14/14a of the M25. The impacts of traffic are compounded by the refusal from Heathrow to 'hardwire' the Parkway into the

strategic road network to avoid rat-running through our Borough, especially when the M25 is congested. In fact, the Northern Parkway is considerably more remote from local communities, whereas our communities will experience the impact much earlier in the phasing programme.

The need for new parkways has arisen due to the construction of the new northern terminal that displaces existing parking south of the Bath Road. This proposal increases the costs of the scheme considerably and has resulted in the proposal to blight our communities with mammoth multi-storey car parks. In the AEC, Heathrow comments that they plan to 'minimise the use of land given over to parking' yet they are displacing uses within the airport boundary and using more land outside the existing boundary. This is not minimising but *increasing* use of land, developing on Green Belt and land that was due to be restored to open space and pushing up the costs of expansion. The use is so intensified at the Southern Parkway that the multiple buildings will rise to nine storeys in height, filling the site and with little spacing between, given their size. There is reference to avoiding build out of more parking than required (7.4.28 Ch.7, doc 2 Updated SDR) but this parkway will be constructed ahead of the Northern Parkway under the phasing plans, meaning that if there is no longer the need to build all the parking it will be the Northern Parkway that is not fully constructed if at all. This would exacerbate the concentration of traffic to the south west of the airport even further.

The AEC documents state that the existing Terminal 5 parking would be relocated initially to Terminal 4 prior to the Southern Parkway being operational. We do not consider that the traffic and air quality implications of this change have been considered, nor logistical issues such as passengers having to travel from T4 to T5.

Nuance

The following extracts from the ANPS are relevant:

- 3.51 Heathrow Airport has committed to ensuring its landside airport-related traffic is no greater than today. The airport will be expected to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040, for passengers.
- 5.5 The Government's objective for surface access is to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport maximised as much as possible. This should be delivered in a way that minimises congestion and environmental impacts, for example on air quality.
- 5.6 A Northwest Runway at Heathrow Airport will have a range of impacts on local and national transport networks serving the airport, during both the construction and operational phases. Passengers, freight operators and airport workers share the routes to and from the airport with other road and rail users, including commuters, leisure travellers and business users. Without effective mitigation, expansion is likely to increase congestion on existing.

The proposals include a surface access strategy that continues to focus on the private vehicle rather than delivering public transport schemes, such as southern rail access, improving access for sustainable modes and reducing the quantum of car parking.

Division

Parking

Southern Parkway

Action

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.

Title

Impact of the Southern Parkway on Stanwell Village and the Borough of Spelthorne

Topical Issue

A parkway of the magnitude proposed in close proximity to residential properties will have a significant and permanent visual impact on local communities. This is in addition to the impacts on traffic and on-street parking discussed elsewhere. The location of the Parkway results in the loss of Green Belt and open space, both The Oaks Biodiversity Site and the Cemex site once restored.

Evidence

The Parkway proposals in the AEC documents indicate an array of buildings up to nine storeys in height to accommodate some 22,000 parking spaces, making it one of the biggest car parks in the world. The location is on the Cemex site that is due to be restored to open space once the minerals and recycling operations have ceased and on The Oaks Biodiversity site, which is public open space created and owned by Heathrow as a mitigation for Terminal 5. These sites are also designated Green Belt and serve an important function in creating a buffer between the north of Stanwell Village and the airport. The sites are within close proximity to residential properties on Park Road, Gleneagles Close, Oaks Road, Stanwell Gardens, Russell Drive and Lowlands Drive, none of which are proposed to be included within the DCO boundary or WPOZ.

The scale of the Southern Parkway is completely unacceptable and to compound this by siting it in a residential area has astounded our local communities. Even the Northern Parkway, at some 24,000 spaces, has been located away from housing and is proposed at a height of around 21-25m, compared to the Southern Parkway which is in close proximity to residential properties and a height of 30m. This must demonstrate that the Cemex site is too small for the number of spaces proposed. The east-west alignment for the layout of the Parkway was discounted in favour of the currently proposed north-south alignment; however, the Scheme Development Report appears to show lower heights above ground level for the buildings on the east-west alignment (although the annotations in the SDR are illegible). If the north-south alignment results in the need for taller buildings it is questioned why the east-west alignment was discounted. The validation study that investigated alternative massing (7.6.76, SDR) resulted in the decision to pursue the north-west alignment, but how much consideration was given to the overall height of the buildings in each alignment? Whilst massing is a key issue, its relevance is reduced when the buildings are sited so close together that they would appear 'as one' from most views.

Discussions with Heathrow on the detailed design of the Southern Parkway have not been particularly fruitful. We were assured of a high quality design that could include acoustic benefits, notwithstanding our overall objections to the location and quantum of parking. The AEC documents indicated open sided modular structures of no architectural merit that do nothing to mitigate the resulting visual impact, light spill, air pollution and noise. This is despite the AEC referring to having taken on board previous feedback and enhanced their design. If the creation of the Parkway in this location is inevitable, despite our objections, we would expect exemplary design to mitigate its impact as much as possible. We asked Heathrow to consider siting some or all of the Parkway below ground but from initial discussions it would appear this would result in prohibitive additional costs and

environmental impacts. A bund is proposed, plus there is public open space indicated below the diverted rivers, but they cannot sufficiently ameliorate the visual presence of multiple nine-storey buildings and associated effects.

Spelthorne is pleased to see that out of the options for the Southern Perimeter Road, the route north of the Parkway with the rivers to the south has been selected as the preferred approach.

Nuance

The following extracts from the ANPS are relevant:

Land use, including open space, green infrastructure and Green Belt

- 5.112 Existing open space, sports and recreational buildings and land should not be developed unless the land is no longer needed or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. If the applicant is considering proposals which would involve developing such land, it should have regard to any local authority's assessment of need for such types of land and buildings.
- 5.114 The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances which are already the subject of Government guidance.
- 5.118 The applicant can minimise the direct effects of a project on the existing use of the proposed site, or proposed uses near the site, by the application of good design principles, including the layout of the project and the protection of soils during construction.

The loss of The Oaks Biodiversity Site and the future restored Cemex site are not being replaced by equivalent or better provision of open space. Heathrow will need to demonstrate that very special circumstances exist that outweigh the harm caused by the Parkway to the Green Belt and any other harm, which we would consider to include the adverse effects of concentrating traffic movements to the south of the airport and on local roads. Spelthorne has yet to be convinced that the significant impact of a building of this scale on open space and Green Belt can be mitigated sufficiently through good design.

Division

Parking

Green & Blue Infrastructure

DRAFT

Potential Biodiversity Impacts

Action

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.

Title

Potential biodiversity impacts – risk of potential effects not being appropriately assessed.

Topical Issue

It is considered that the potential for biodiversity effects has not been transparently assessed in the PEIR, posing a risk to biodiversity. A number of potential effects have been 'scoped out' and are therefore not assessed at all, which is of concern when the baseline is incomplete. Of the effects that have been 'scoped in', the assessment is based on:

An incomplete baseline

- Assumptions that the green infrastructure proposals will adequately and appropriately mitigate likely significant effects, and,
- Inadequate cumulative assessment to fully understand the impacts, in particular habitat loss and habitat fragmentation.

Evidence

Table 8.43 volume 1 Chapter 8 of the PEIR provides a summary of the assessment of biodiversity effects which includes a summary rationale, for example 'fragmentation of habitat used by badgers is predicted, although it is likely to be mitigated by the provision of well planned, connected green infrastructure....no significant adverse effects are therefore predicted'. However the information that is presented on the green infrastructure or the biodiversity offsetting (Appendix 8.6 Volume 3) to support such a statement is lacking the detail to allow SBC to reach an informed view as to whether this is the case or not. This issue is evident for a number of the potential effects that have been assessed.

Nuance

The EIA Regulations require that the EIA must identify, describe and assess in an appropriate manner....the direct and indirect significant effects of the proposed development on...biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC ' (Regulation 5(2)(b) so that consultation bodies can reach an informed view on the likely significant environmental effects of a proposed development.

Airports National Policy Statement (NPS) (Department for Transport 2018) Paragraph 5.85 which states: 'The Government's biodiversity strategy is set out in Biodiversity 2020: A Strategy for England's wildlife and ecosystem services. Its aim is to halt overall biodiversity loss, support healthy, well-functioning ecosystems, and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.'

Furthermore, paragraph 5.89 which states: 'The applicant should ensure that the environmental statement submitted with its application for development consent clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological importance, protected species, and habitats and other species identified as being of principal importance for the conservation of biodiversity'.

Division

Green and Blue Infrastructure

DRAFT

Incomplete Ecological Baseline

Action

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.

Title

Incomplete ecological baseline – effects cannot be appropriately assessed with an incomplete baseline.

Topical Issue

The nature of environmental impact assessment is such that in order to assess the likely significant effects of a proposed development it is essential to understand the current baseline. Therefore an incomplete baseline undermines the robustness of the assessment in the PEIR and inhibits the ability of Spelthorne to fully understand the potential effects.

Evidence

The PEIR indicates that the ecological baseline has not been completed and does not provide confirmation of when the baseline surveys will be completed in relation to the submission of the DCO. With an incomplete baseline it is considered that the assessment of significant impacts cannot be undertaken fully and in line with the precautionary approach.

Dates of future surveys to complete the baseline are indicated in Table 8.6 Volume 1 Chapter 8 of the PEIR, however footnote 23 (page 8.28 Volume 1 Chapter 8 of the PEIR) states 'Future surveys are indicative only.'

Nuance

The baseline study is required in order to be able to determine the level of potential impact that may result from the proposed development. It is essential that the baseline information collected is representative both spatially and temporally. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) require that the Environmental Statement includes 'a description of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without the implementation of the development' (Schedule 4 (4)).

Division

Green and Blue Infrastructure

Proposed Biodiversity Mitigation

Action

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.

Title

Proposed biodiversity mitigation – risk that the ongoing development of proposed biodiversity mitigation does not truly reflect potential effects on Staines Moor SSSI

Topical Issue

It is considered that if the ecological baseline is incomplete then there is a risk that the ecological impact assessment will not have appropriately assessed the significance of the effects on Staines Moor SSSI and therefore the proposed mitigation will not reflect the potential effects. The overall premise of the ecological impact assessment is that there will be net biodiversity gain but at this stage there is insufficient information to be able to determine if this is achievable. The implementation and long-term management of green infrastructure proposals will be critical to the long-term success of those proposals which will ultimately determine the success of net gain in biodiversity.

Evidence

In the absence of fully representing the likely significant effects of the DCO Project on the biodiversity resources of the Borough it is not possible to fully understand if the proposed mitigation is adequate or appropriate, particularly in terms of mitigating biodiversity loss. The Biodiversity Offsetting approach provided in Volume 3 Appendix 8.6 provides guiding principles but currently there is a lack of detail to provide comfort that the biodiversity offsetting is appropriate and maintainable in the long-term.

Nuance

There is a heavy reliance within the PEIR that the Green Infrastructure Loop will mitigate a number of the biodiversity impacts that have been identified, however there is a lack of detail in relation to the green infrastructure proposals. There is also a lack of consideration in relation to the implementation, such as timing on delivery, the ongoing maintenance of the green infrastructure proposals. As such it is difficult to determine if such schemes will be effective in meeting mitigation objectives.

The PEIR states 'at this stage of the DCO Project it is not possible to calculate the gains to biodiversity as the design of the green infrastructure is not yet developed enough to enable this. At the time of the application for development consent gains to biodiversity will be calculated and presented, thereby demonstrating the delivery of a biodiversity net gain' (Paragraph 8.13.3 Volume 1 Chapter 8). However, as per the incomplete baseline it provides Spelthorne limited scope to understand the biodiversity mitigation in relation to the potential impacts.

Airports National Policy Statement (NPS) (Department for Transport 2018) Paragraph 5.85 which states: 'The Government's biodiversity strategy is set out in Biodiversity 2020: A Strategy for England's wildlife and ecosystem services. Its aim is to halt overall biodiversity loss, support healthy, well-functioning ecosystems, and

establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.'

Furthermore, paragraph 5.89 which states: 'The applicant should ensure that the environmental statement submitted with its application for development consent clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological importance, protected species, and habitats and other species identified as being of principal importance for the conservation of biodiversity'.

Division

Green and Blue Infrastructure

DRAFT

Proposed Water Environment Mitigation

Action

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.

Title

Proposed water environment mitigation – risk that the ongoing development of proposed water environment mitigation does not meet WFD requirements and does not truly reflect the potential effects on water features within Spelthorne.

Topical Issue

The Preliminary WFD Risk Assessment (Volume 3 Appendix 21.3) has assessed all of the WFD features within Spelthorne (with the exception of Surrey Ash) as High for an Overall Risk of Deterioration for Biological Quality Element. This in effect means that in the absence of appropriate mitigation that the implementation of the DCO project would result in water features deteriorating from their current state, which would be non-compliant with the requirements of the WFD.

Evidence

Although the Preliminary WFD Risk Assessment (Volume 3 Appendix 21.3) has taken a precautionary approach and assessed the risk as High, there are statements in that document that mitigation will reduce the risk and on the long-term there is potential for overall improvement to the physical habitat and aquatic ecology. However there is no detail provided on such mitigation proposals in the PEIR to provide comfort that the mitigation is appropriate.

Nuance

The ANPS has an objective to achieve compliance with the WFD through no deterioration in status or prevention of achieving good future status of WFD features, without requiring an Article 4.7 derogation. Currently as per the Preliminary WFD Risk Assessment (Volume 3 Appendix 21.3) there is a risk that the DCO Project will not meet the ANPS objective.

Division

Green and Blue Infrastructure

Contextualising Air Transport Emissions

Action

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.

Title

The future air transport emissions are not in keeping with the CCC's Further Ambitions scenario, which is required to meet a Net Zero target.

Topical Issue

Air transport accounts for over 95% of Heathrow's Greenhouse Gas emissions, of which 99% are from international aviation. International aviation is by far Heathrow's most significant source of GHG, which currently contributes 58% to the total UK international flight emissions.

As the UK now has a legally binding target of net zero emissions by 2050, and the CCC recommends that the Further Ambitions options are all likely to be needed to meet a Net Zero target, then the future air transport emissions indicated are not in keeping with the Further Ambitions scenario to reduce aviation emissions below the Core scenario which is 30 MtCO².

Evidence

Though Table 9.7 within the PEIR in chapter 9 presents the current baseline GHG emissions from international flights departing Heathrow as 19.9 MtCO² (CO² emissions only), the data presented in Table 9.14 shows that the future air transport emissions (including international aviation) are estimated to increase to an emission peak in 2035 at 25.1 MtCO² before steadily falling to 19.9 MtCOs in 2050. The current Heathrow international air transport baseline is 58% of the total UK international flight emissions. Heathrow's future air transport emissions are estimated to be:

- 67% of the Core scenario levels in 2035 and 53% of the Core scenario levels in 2050.

However, with the adoption of the Net Zero target it is more appropriate to contextualise future emissions against the Future ambitions scenario. Heathrow's air transport emissions are estimated to be:

- 84% of the Further Ambitions scenario levels in 2035 and 66% of the Further Ambitions scenario levels in 2050

Heathrow's contribution to the UK total, assuming it is 30 MtCO² in 2050 would increase which would mean other airports would have to decrease their emissions to achieve the Further Ambitions scenario.

Nuance

Chapter 9, Table 9.3 details that the CCC has assumed in its Core scenario that emissions from UK aviation would be aligned with the Government's proposed objective (as detailed in the Aviation 2050 strategy consultation) for emissions in 2050 to be at or below 2005 levels (37.5 MtCO²). However, the language in the Net

Zero technical report is subtly different. It talks of 'stabilising' and 'holding' emissions at 2005 levels, suggesting that the CCC do not expect future aviation emissions to rise above 37.5 MTCO₂.

As established by the NPS, para 5.74, the largest carbon impact of expanded Heathrow will come from increased emissions from air transport movements (both international and domestic) as a result of increased demand. Therefore, it is essential that Heathrow maintains either the cap imposed on UK aviation emissions in line with the Committee on Climate Change's planning assumption of 37.5 million tonnes of CO₂ in 2050 or the international trading mechanism cap which allows carbon emissions from aviation to be offset by paying for emissions reductions in other sectors of the global economy (para 5.75).

Division

Green and Blue Infrastructure

DRAFT

Non CO² Emissions from Air Transport

Action

Spelthorne requests that non-CO² air transport emissions are considered as part of the quantification of Greenhouse Gas (GHG) emissions.

Title

Non-CO² emissions – air transport effects are greater than just CO².

Topical Issue

The air transport assessment (aircraft that take-off and land at Heathrow) considers only CO² emissions. Aviation has effects on climate beyond that resulting from its CO² emissions, including effects on tropospheric ozone and methane from its NO_x emissions, water vapour, particle emissions and formation of contrails/enhanced cirrus cloudiness. This is usually calculated with the climate metric 'radiative forcing'. Aviation was shown by the Intergovernmental Panel on Climate Change (IPCC) to have a total radiative forcing of 2.7 times that of its CO² radiative forcing for a 1992 fleet (the so-called Radiative Forcing Index, or RFI), excluding any effect from enhanced cirrus cloudiness which was too uncertain to be given a 'best estimate'.

Whilst it is incorrect to multiply CO² emissions by the RFI, it is clear from the aforementioned that aviation's effects are more than that of CO² alone. Currently, there is not a suitable climate metric to express the relationship between emissions and radiative effects from aviation in the same way that global warming potential does. Nonetheless, it is clear that aviation imposes other effects on climate which are greater than that implied from simply considering its CO² emissions alone.

Evidence

Heathrow's rationale for not assessing air transport's non-CO² emissions is set out in Chapter 9, 9.4 Scope of Assessment. The rationale is centred on the Committee on Climate Change (CCC) advice to Government that non-CO² effects are not, at the moment, included in national or international emissions inventories and are not addressed explicitly as part of the CCC scenarios for reducing aviation and shipping emissions in the UK.

Nuance

The CCC advice on non-CO² emissions is aimed at Government policy and national and international emissions inventories, it is not necessarily a guide for the scope of an Environmental Impact Assessment (EIA).

Exclusion (cut off rules) for scoping the boundaries of the GHG emissions assessments are well developed (Ref: IEMA, Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance). Activities that do not significantly change the result of the quantification can be excluded, however non-CO² emissions could significantly change the quantification, and therefore should be included within the quantification.

The Government's guidelines for company greenhouse gas reporting recommends an emissions multiplier for all aviation effects (similar to a radiative forcing index) of 1.9 times the effects of direct CO² alone, although it acknowledges the multiplier is subject to significant uncertainty.

Division

Green and Blue Infrastructure

DRAFT

The Effectiveness of CORSIA

Action

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.

Title

CORSIA – is it really going to offset the growth in CO² emissions

Topical Issue

The PEIR states that much of the growth in CO² emissions from the DCO Project would be offset by airlines as part of their obligations under CORSIA [Chapter 9, para 9.16.5]. However, there are concerns about the effectiveness of CORSIA.

Evidence

The largest source of carbon offsets comes from the United Nations' Clean Development Mechanism (CDM). The CDM has generated billions of certified emissions reductions (CERs) since its inception. There are currently enough CERs on the market to fulfil CORSIA's projected demand of 2.7 billion tonnes of carbon offsets through 2035.

While CERs are abundant, there is emerging evidence questioning their additionality relative to existing policies. A recent analysis sponsored by the European Commission argues that only 2% of the projects and 7% of CERs supplied have a high likelihood of delivering additional emission reductions that would not have occurred in the absence of the CDM program. Despite these risks, countries such as Brazil and China have called for the automatic eligibility of CERs in CORSIA.

The current supply of carbon offsets provides a more cost-effective form of carbon abatement for the aviation sector than fuel-switching and therefore it has been suggested CORSIA will not bring about substantial in-sector decarbonisation of air transport.

Nuance

CORSIA may not offset the growth in CO² emissions from the DCO Project as it has an end date of 2035 and it will need to be based on robust rules to deliver genuine emissions reductions.

Division

Green and Blue Infrastructure

Need to Compensate for Loss of The Vineries Allotment Site

Action

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 reprovion of an allotment site with a commuted sum to ensure adequate maintenance.

Title

Reprovide the current allotment site in a suitable location for the use of Stanwell Moor residents.

Topical Issue

Due to the threat of the current allotment site in Stanwell Moor being obliterated and used for other purposes with regards to the expansion of Heathrow for a number of years, residents have been reluctant to cultivate plots on this site.

Evidence

The persistent threat of Heathrow expansion and the loss of The Vineries Allotments has resulted in local residents and past and present plot holders unwilling to spend time and money on cultivating their plots.

The result has been an overgrown site that Spelthorne has to maintain by spending its limited budget on cutting back vegetation and ensuring there are no security breaches due to the fact that there are few people on site.

Current and previous plot holders have requested a site in Stanwell Moor that can be used for the cultivation of allotments that will be protected from this threat and that they can invest their time and money with no risk of the site being removed.

Nuance

The NPS says that “existing open space, sports and recreational buildings and land should not be developed unless the land is no longer needed or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location” (NPS para 5.112)

Division

Green and Blue Infrastructure

Expansion Proposals Must Not Increase Flood Risk

Action

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.

Title

No increase in flood risk.

Topical Issue

Over the next few decades, climate change is likely to result in milder, wetter winters and hotter, drier summers in the UK, while sea levels will continue to rise. In addition to the increased risks of flooding, the long-term effects of climate change will result in changes to weather-related disruption, most often caused by wind, rain, snow and ice.

Spelthorne is flat and low-lying and also, because of its proximity to the River Thames, a significant area is at risk of flooding. Therefore, Heathrow's proposals must not increase the risk of flooding. Flood risk assessments need to be integrated with the work being carried out on the River Thames Scheme by the Environment Agency to minimise this risk.

Evidence

Regarding flood risk, to provide any meaningful comments on the proposals or options, Spelthorne requires greater detail, including Flood Risk Assessments, GIS shapefiles of alignments, mitigations and likely structures and barriers. Spelthorne must be informed of when, how and where these processes and structures will be managed, implemented and enforced. Also, each option/proposal under consideration requires a full analysis to demonstrate that the option chosen has the lowest risk, best environmental gain and overall balances cost or disruption with mitigated impact.

At present, Spelthorne considers that the proposals fail to address the issue of flood risk for those areas most affected by expansion as Heathrow's 2014 commitment to reducing flood risk has not been adopted. For example:

- Hithermoor's ground and surface water flows, and modelling have not sufficiently been considered;
- The issue of bird strike;
- Interaction with River Thames scheme;
- Large area south of Hithermoor potential for water mitigation/access and temporary work outside the DCO boundary;
- Drainage solution for airfield only – not car parks

Nuance:

There is the potential for airport expansion to result in increased risk from climate change effects, particularly to increased surface water runoff rate, pressure on potable water supply and effects on groundwater (NPS para 5.150). As with any

planning application the scheme must comply with the National Planning Policy Framework and demonstrate that flood risk will not be increased elsewhere, a similar assertion reiterated in the NPS.

Division

Green and Blue Infrastructure

DRAFT

Strategic

DRAFT

Recovery Responsibilities on Major Accidents and Disasters

Action

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.

Title

Adequately inform Spelthorne and Surrey Local Resilience Forum at the appropriate time of the specific mitigations in place and their response/ recovery responsibilities in the event of a MA&D.

Topical Issue

As a local authority with duties to the local community including the provision of emergency housing in a MA&D and supporting evacuation and welfare requirements, Spelthorne lacks detailed information surrounding the risks, particularly those identified in Chapter 16's Appendices as being medium to very high. The construction will require further emergency planning responsibilities, particularly around offsite implications of an onsite emergency and multi-agency interoperability. Without more detailed information it is not possible to plan appropriately, understand what Heathrow might expect from Spelthorne or conclusively agree there will be 'no significant effect' throughout the three phases of the project.

Evidence

Heathrow stated that at present, engaging Future Heathrow with LRFs is not considered to be appropriate and the level of detail provided in the draft CoCP and PEIR is commensurate with the planning phase. To our knowledge, the expansion project has not been discussed at HARP in any detail to date. We would welcome early engagement via the Local Resilience Forum to ensure that the multi-agency response to a MA&D is achievable during all phases of the project. For example, construction workers identified under the DCO would be a significant consideration for the local authority, social services and health partners in the event of a MA&D where we may be required to support an evacuation and mass homelessness or a pandemic as a neighboring borough. If support is available from Heathrow or there is an expectation of collaborative working to manage these risks, Spelthorne would need to consider these in the borough level Emergency Plan, Emergency Assistance Centre Plan and other linking plans for the duration of the project. The PEIR assumes legislative compliance by all agencies and contractors without designating a responsible body/individual for ensuring implementation of the mitigations to limit the risk of MA&D. Where agencies are required to work together to agree emergency or contingency plans, there is a need for guidance as to the process for initiating the discussions, sign off and where Heathrow fits into the process, particularly if there is a lack of capacity/disagreement around roles and responsibilities.

Nuance

"The Government agrees with the Airports Commission's conclusion that "to make expansion possible...a comprehensive package of accompanying measures [should

be recommended to] make the airport's expansion more acceptable to its local community, and to Londoners generally" (ANPS 3.54). If Spelthorne is required to do more to maintain baseline standards of emergency planning and response, accompanying measures and funding should be put in place to support the local authority in doing so, possibly through a dedicated 'Heathrow Expansion Resilience Forum' to run alongside HARP.

Division

Strategic

DRAFT

Over Reliance on Desk-Based Evidence

Action

Spelthorne asks that Heathrow steps outside of its models and uses real information instead of an overreliance on computer models and desktop analysis.

Title

There is an over reliance on using desktop evidence

Topical Issue

Spelthorne is concerned that much of the evidence used to demonstrate models, identify whether a risk has a significant impact and what should be mitigated against has been completed in a desk top way and is not representative of the reality.

Evidence

The emergency and disaster recovery plan is based on a scoring matrix and not as a result of learning from real events or from analysis of their current plan. Risks from terrorists' attacks has not even be shared or discussed and this must be considered as a key risk.

The compensation fund has yet to be completed but the current draft has not considered learning from lessons of the existing scheme or of other schemes such as the one for HS2. This omission was admitted at the workshops for the PEIR. The omissions include no compensation yet for displaced businesses. Use of the fund to pay for mitigation as a result of being subjected to unacceptable noise or pollution instead of this being part of the DCO. The WPOZ has not been extended into Stanwell Moor and Stanwell Village although these communities are significantly impacted in a number of ways.

The air quality and noise information is just data and does not explain the implications of it. The methodology was highly criticised at the PEIR review workshop as it takes an average noise. This masks the very noisy and detrimental impact of single flights in the early hours as it can spread extremely noisy and disturbing night flights over a larger period to show no noise disturbance.

The socio economics and employment are using Oxford economics model. This does not take into consideration market value of property or consider information at a sub region level and these are considered a significant shortfall of the model.

Spelthorne remains concerned regarding the suitability of these models to accurately predict the effects of the expansion and adequately identify appropriate mitigation for our communities.

Nuance

At the Socio Economics and employment PEIR it was made clear that it is yet to be concluded regarding significance.

The model used is from Oxford Economics but the approach does not consider any impact on existing businesses.

Spelthorne raised the potential for business to fail because they may no longer be economically viable because the labour market costs have increased. This was raised on 5 June but is still not considered within the current consultation.

Assumptions made such as that there are 23,000 to 26,000 homes vacant in the locality. Based on national figures stating that 10% of all privately rented property is vacant. This is disputed as there is no local evidence of this and Heathrow has not conducted any sense checking.

In the PEIR clarification meeting for the community PEIR it was admitted that the measures are generic regarding recreation and community. This is a significant shortfall.

Division

Strategic

DRAFT

No Evidence of using Best Practice or Lessons Learnt

Action

Heathrow needs to ensure lessons learned from the building of Terminal 5, the HS2 project or the Olympics form part of its strategic vision for expansion and feed into the detail.

Title

No evidence of using best practise or lessons learnt

Topical Issue

Spelthorne remains concerned that policies are being written without a consideration of what is in place and whether that is currently working properly. This means that key learning could be lost and past mistakes could be repeated.

Evidence

The Community Compensation Fund is being developed without a review of the current scheme or learning from major comparative schemes such as HS2. Feedback given repeatedly at the PEIR workshops pointed to the fact that the fund should not be used for mitigation but for compensation.

It should also consider including businesses that are no longer economically viable due to the expansion of the airport and recruitment of large numbers of staff pushing up labour costs.

The Major Accidents and Disasters Plan is not being drafted looking at other major events or after a review of the current.

It does not include terrorist or deliberate attacks on the airport and this is a major flaw. Whilst Spelthorne understands the need for some confidentiality, we also need assurance that these matters are being properly considered and planned for.

Massive assumptions are being made such as that 10% of all privately rented property is empty and so that can be used to house 20,000 workers. It is bizarre and the assumption is not evidence or is agreed by any authority.

Nuance

At the community PEIR workshop it was admitted that the current fund is still being reviewed as part of the proposals.

At the major disaster PEIR it was admitted that the current plan is not being reviewed in detail and that any security risks are being dealt with differently and confidentially.

At the Socio economic workshop the effects of the labour market of mass recruitment for the Heathrow Expansion were not being considered and the knock-on effect to the cost of labour not considered a possibility and therefore not planned or considered.

There is yet to be a finalised Surface Access Strategy, a Construction Workforce Plan, Accommodation Strategy, Community Compensation Fund etc.

Under section 5.79 of the revised NPS it is stated 'Development of a construction traffic management plan'. And that it should 'draw on best practice from other major construction schemes.'

There is no evidence that best practice and learning is being used to inform current policy and procedures.

Division

Strategic

DRAFT

Cumulative Effects on Communities of the Different PEIRs

Action

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.

Title

The proposed airport expansion and its effects are not being considered in the round.

Topical Issue

Spelthorne is concerned about the piecemeal approach consistently adopted by Heathrow. Heathrow is not considering the cumulative effects on the communities of the different PEIRs.

Evidence

Heathrow has yet to develop and finalise or particularise some of their key policies and procedures:

- The Community PEIR is yet to be completed.
- The Community Compensation Fund is yet to be completed.
- The Green Loop is yet to be finalised as only 50% of the land is in the ownership or control of Heathrow.
- The air quality cannot be effectively detailed when the construction transport plan has not been developed, the surface access strategy is not developed, and the timeline for the works has not been fully developed.

Without knowing this detail, it is not possible to state what the pollution, noise or other harmful effects are on our community.

Nuance

During all the PEIR clarification workshops, all of which were attended by Spelthorne, concerns were raised about the effects on the other PEIRs. Whilst each document refers to the other chapters the effects are not considered in a cumulative way.

The following key policies are still outstanding:

- A surface access strategy is yet to be completed.
- A workers accommodation strategy is yet to be completed.
- A compensation fund detail is yet to be completed.
- The detail of the construction phase is yet to be detailed.

In the revised NPS - 5.242 'People are entitled to know what steps will be taken to help protect them.....where appropriate help them move house'.

Spelthorne is of the view that the Statement of Community Consultation has not been followed.

The legal duty to consult as detailed on page 9 includes 'local communities in the vicinity of the project'. However, the vicinity of the project is much wider than that consulted with.

There are much wider and newly impacted communities not currently being consulted with.

Division

Strategic

DRAFT

Passing on Statutory Duty

Action

Spelthorne asks that Heathrow stop trying to pass over statutory duties to third parties.

Title

Passing on statutory duty

Topical Issue

It has become apparent that Heathrow are attempting to delegate the majority of their statutory duty to contracted third parties, who may lack knowledge or experience to effectively manage risks.

Evidence

In a number of the PEIRs Heathrow seeks to pass over their statutory duty to third parties to monitor and to take action if things go wrong. Examples of this include:

- Major Accidents and Disasters being managed by the contracted third parties.
- That the contracted building firms have responsibility for their employees' conduct and accommodation.
- That the Community Fund be managed by HCEB.

This approach is concerning to Spelthorne as it is in the interest of the third party to not be transparent when things go wrong and the costs of effective risk management might result in corners being cut in order to drive up costs.

Spelthorne is concerned about the lack of checks and balances regarding this aspect and how control and standards will be maintained during the construction phase and beyond.

Nuance

Heathrow has indicated during the major disaster workshop that the statutory duty to monitor and react to disaster or accidents will be passed onto the contractors. The desktop exercise did not even include terrorist attacks, infectious diseases, or a review of the existing plan.

Of further concern is that some of the models have used a basic scoring matrix relying on others statutory responsibility and therefore identifying no risks!

Division

Strategic

Focus Too Narrow

Action

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.

Title

Too narrow focus

Topical Issue

Heathrow has not properly identified or engaged with all of those that will be affected by the expansion in turn depriving stakeholders from being effectively consulted with.

Evidence

Heathrow's attempts to engage with vulnerable people or those with protected characteristics was inadequate with only 9 people attending their workshop in Stanwell, most of which were councillors or from Spelthorne or the hall.

This must mean that some communities have yet to be appropriately engaged. Spelthorne is not surprised by this, but are disappointed. Spelthorne continually expressed concerns regarding the methodology of consultation and engagement and the inaccessibility of the key documents asking Heathrow for a brief summary that can be shared with residents.

Spelthorne believes that giving a link to those in the most deprived areas to try and download documents was a mistake. There was nothing in the advertisements to inform people that the documents can be made available to those without English as their first language. There was nothing available for those with a sensory impairment. There was nothing available for those that might struggle with understanding complex documentation.

At the events, there were no booklets in any other language other than English.

Spelthorne asked Heathrow for additional documents some of which appeared very late and some of which never arrived.

Spelthorne undertook to draft their own leaflet recommending that comments be emailed as we felt the booklet steered a certain response and was not truly open.

In addition, the geographical area of those being consulted is too narrow. Those currently overflowed will not include all those communities that may be affected by the expanding airport.

Nuance

Those consulted under Heathrow's legal duty as shown on page 9 of their Statement of Community Consultation states that 'local communities in the vicinity of the project. Under 3.1.7 says those who are overflowed.

Spelthorne is of the view that the draft Statement of Community Consultation has not been followed.

Under 3.1.7: 'extending to those within the area in which noise effects from overflying aircraft...'. This means that those not currently experiencing noise from being overflown are not targeted. This lack of engagement will result in those not currently overflown not understanding that they may become overflown in the future. Focusing on only those, which currently experience noise as opposed to those that might, will give a skewed response and deny those who might be effected from understanding their fate. Depriving them of an opportunity to voice their view.

Under 3.1.9: as regards documentation – 'for inspection by the public in a convenient manner'. Spelthorne will argue that this has not occurred and the documentation is not in a convenient manner and is very difficult to understand and digest and runs to thousands of pages.

Division

Strategic

DRAFT

Legacy

DRAFT

Need for Tangible Legacy Benefits

Action

Heathrow to offer tangible legacy benefits as part of its Masterplan and set out funding sources with governance structures prior to DCO submission.

Title

Genuine legacy and strategic vision.

Topical Issue

Whilst the AEC documents include reference to mitigation and compensation, there is scant regard for genuine legacy and a lack of ambition. Spelthorne and other members of the Heathrow Strategic Planning Group (HSPG) are left feeling there are no tangible benefits being offered to residents, businesses and local authorities. This represents a lost opportunity for Heathrow to promote growth in our boroughs and districts, plus spreading the benefits of expansion to wider areas, with a clear narrative and strategic vision.

Evidence

Expansion of Heathrow will benefit the UK economy but the localised impacts will be significant and long-term. Other major schemes on this scale have included clear plans to leave a legacy to benefit local communities, such as the London Olympics. This is distinct from mitigation and compensation, which any major infrastructure scheme would be obliged to provide. It is acknowledged that delivering a legacy comes with a price-tag and there are already concerns over the cost of the expansion project but other funding options for income, either accruing from the expansion itself through various charging systems and business rate growth or direct from Government. This is mentioned in the AEC documents but at high level and not in any detail, for example ensuring a proportion of new apprenticeships are ring-fenced or directed to local colleges in areas most affected by expansion (covered further under the 'Apprenticeships' section elsewhere). Some items labelled as 'legacy' are simply improvements that could or should have been delivered even without expansion, for example by enhancing active travel routes and biodiversity sites to mitigate the impact of the existing airport, or represent compensation for the expansion itself, such as 'new' open spaces when many will be lost.

The development of the Masterplan and the land use strategy offered the opportunity to look outwards from the airport boundary and beyond to sustainable locations that could accommodate uses that support employment, such as hotels and offices, and potential for new public transport links. This would have the effect of reducing the need for developing open spaces and Green Belt as well as regenerating towns and improving connectivity, serving as a legacy for expansion. Instead, Heathrow has focused on areas closest to the airport boundary, most of which are undeveloped but serve important functions as open space, Green Belt and biodiversity sites. This lack of ambition has continued throughout the development of the Masterplan as these points were raised by Spelthorne and other HSPG members and the plans now being consulted on are not significantly different to those presented to us in early engagement, nor even Heathrow's early masterplan in the Airports NPS.

Nuance

The ANPS states:

4.4 In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State will take into account:

- Its potential benefits, including the facilitation of economic development (including job creation) and environmental improvement, and any long term or wider benefits; and
- Its potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts.

4.5 In this context, environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels. These may be identified in the Airports NPS, or elsewhere. The Secretary of State will also have regard to the manner in which such benefits are secured, and the level of confidence in their delivery.

Spelthorne considers that the proposals set out in the AEC fail to address the issue of benefits, as distinct from mitigation and compensation.

Reference to building a 'long-term, sustainable legacy for our local communities' implies that the expansion itself is the legacy (3.6.10 Preferred Masterplan) rather than setting out what legacy could be offered beyond the DCO boundary.

Division

Legacy

Need for Legacy Amenity Facilities

Action

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.

Title

Legacy – need for amenity facilities

Topical Issue

Whilst the AEC documents include reference to mitigation and compensation, there is scant regard for genuine legacy. No tangible community benefits are being offered to those residents and businesses who will be most directly affected by the expansion (Stanwell Moor and Stanwell).

Evidence

Locally, the expansion will have significant impacts on nearby communities. The physical changes to roads and new developments will result in these areas being more isolated and 'cut off' from the remainder of the Borough. None of the various AEC documents are explicit about the provision of 'concrete' community facilities.

The Community Compensation Fund is only designed to mitigate the impact of expansion through the provision of up to £50m each year (for the next 15 years) to local communities. It is certainly not designed to proactively address the effects of expansion since it will only come into play during construction or after completion. There is no recognition that any facilities need to be in place throughout construction (these facilities need to be in place at the beginning rather than waiting until they are well into the construction cycle).

Heathrow were advised in Spelthorne's response to its CON 1 consultation back in March 2018 that the Borough required early implementation of a number of measures in order to safeguard community interests. This included the provision of leisure/community facilities in the most affected areas. Despite discussions with Heathrow on this matter there has been a distinct lack of progress. Spelthorne urges Heathrow to recognise that the best time to have started planning for community safeguarding measures was over 18 months ago when Spelthorne first raised them.

Work undertaken by the Council has demonstrated the need for such facilities. Spelthorne is content to be directly commissioned to undertake the procurement, design and build for the enhanced facility, or can work in a joint venture with Heathrow.

Nuance

The ANPS states:

- 4.5 In this context, environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels. These may be identified in the Airports NPS, or elsewhere. The Secretary of

State will also have regard to the manner in which such benefits are secured, and the level of confidence in their delivery.

Spelthorne considers that the proposals set out in the AEC fail to address the issue of new community facilities for those villages most affected by expansion.

Division

Legacy

DRAFT

Enforcement

DRAFT

Costs for Monitoring and Enforcement Action

Action

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.

Title

Heathrow should bear the costs of all construction/supply chain monitoring and enforcement action.

Topical Issue

Heathrow is about to let contracts for many billions of pounds worth of construction related activity. The supply chain for this activity is vast and complex. This will consist of a small number of main contractors and a host of sub-contractors and other suppliers.

Experience from the development of Terminal 5 (T5) showed that some unscrupulous suppliers and sub-contractors were prepared to breach environmental regulations in order to profit from the business opportunities afforded by Airport expansion. Each breach of regulation represents a diminution in the quality of life for our residents. It also represents a burden on the tax payer to police the unscrupulous contractors.

It is Heathrow's responsibility to procure in such a way so as to ensure that their contractors (and sub-contractors) do not breach planning, public health and environmental protection regulations. If the Council has to enforce against these suppliers and cannot recover its costs then it should have a remedy against Heathrow.

Evidence

During the development of T5 Spelthorne had to deal with a number of cases in the north of the Borough about unauthorised use of land for storage of building materials and construction workers' temporary housing. In each instance, Spelthorne went against the land owners and those responsible for the breaches. These matters lasted for many years and Spelthorne's costs were never fully recovered when one of the main protagonists moved overseas to escape the jurisdiction of the Courts.

Nuance

The NPS says at 5.40:

Mitigation measures at the construction stage should also be provided and draw on best practice from other major construction schemes, including during the procurement of contractors.

The NPS says at 5.41 and 5.63:

The implementation of mitigation measures may require working with partners to support their delivery

Division

Enforcement

DRAFT

Funding and Implementing the Traffic Management Plan

Action

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).

Title

Heathrow to fully fund and implement an effective Traffic Management Plan, including suitable engineering solutions and an effective automatic traffic management system infrastructure in advance of development.

Topical Issue

The development of the Airport is likely to involve many thousands of lorry movements over a prolonged period and the transport impacts of such a project have to be managed and mitigated effectively. (Refer to the ATTEND sheets in relation to Construction impacts).

An effective TMP, including engineering solutions and an automatic traffic management system, will be essential to ensure that construction traffic does not cause undue disturbance to residents.

The extent of Heathrow's development and the prolonged period over which it is delivered means that there should be a visible and transparent way for such a plan to be monitored, policed and enforced.

Experience from major developments shows that notwithstanding the existence of such plans there are always occasions when contractors or drivers do not adhere to the rules in order to take short-cuts, save time etc. The impact of such maverick behaviour could be substantial in scale and impact when magnified over the time and extent of this development.

Evidence

Recent large developments in the Borough such as BP Centre in Sunbury, Eco Park in Shepperton have all had TMPs in place. However, residents have still complained of instances where lorry movements have been in breach of these Plans. Evidencing and investigating any such breach is difficult and normally ends with negotiation between Council and main contractor for improved behaviour. This means that the TMP lacks teeth as far as residents are concerned.

Preventing access by construction traffic through physical width restrictions and effective policing of a Traffic Management Plan will provide the evidence needed for local authorities to take effective enforcement action. This will usually amount to a Temporary Stop Notice to ensure that the breach has been rectified to the

satisfaction of the local planning authority. (Alternatively Heathrow could undertake to pay increasing monetary penalties for breaches).

Nuance

The NPS says at 5.80:

Mitigation measures at the construction stage should also be provided and draw on best practice from other major construction schemes, including during the procurement of contractors. Specific measures could include but are not limited to ... Development of a construction management plan

The NPS says at 5.81:

The implementation of mitigation measures may require working with partners to support their delivery

Division

Enforcement

DRAFT

Glossary

ABTA	Association of British Travel Agents
ATTEND	Action, Title, Topical Issue, Evidence, Nuance, Division
ACP	Airspace Change Process
AEC	Airport Expansion Consultation
ANPS	Airports National Policy Statement
APF	Aviation Policy Framework
ATM	Air Traffic Movements
AQMA	Air Quality Management Area
CAA	Civil Aviation Authority
CCC	Committee on Climate Change
CCF	Community Compensation Fund
CCTV	Closed Circuit TV
CTA	Community Transport Association
CDM	Clean Development Mechanism
CER	Certified Emissions Reduction
CO ²	Carbon Dioxide
CON 1	Consultation 1
CON 2	Consultation 2
CPA	Construction Products Association
CoPA	Control of Pollution Act
CORSIA	Carbon Offsetting and Reduction Scheme
CS10	Construction Support Site 10
CS10	Construction Support Site 11
DCO	Development Consent Order
JPC	Joint Planning Committee
EIA	Environmental Impact Assessment

EEC	European Economic Community
ES	Environmental Statement
FRA	Flood Risk Assessment
GHG	Greenhouse Gas
GIS	Geographic Information System
HAL	Heathrow Airport Limited
HARP.	Heathrow Airport Resilience Partnership
HCEB	Heathrow Community Engagement Board
HSPG	Heathrow Strategic Planning Group
HS2	High Speed 2
ICCAN	Independent Commission on Civil Aviation Noise
IEMA	Institute of Environmental Management and Assessment
IPA	Independent Parallel Approach
IPCC	Intergovernmental Panel on Climate Change
LA	Local Authority
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer
LOAEL	Lowest Observed Adverse Effect Level
MA&D	Major Accident and Disaster
MUGA	Multi Use Games Area
NMT	No More Traffic
NPS	(Airports) National Policy Statement
PBN	Precision Based Navigation
PEIR	Preliminary Environmental Information Report
POCWTP	Preliminary Outline Construction Worker Travel Plan
PTIR	Preliminary Transport Information Report
QC	Quota Counts
RFI	Radiative Forcing Index
SAP	Surface Access Proposal

SAS	Surface Access Strategy
SID	Standard Instrument Departure
SLR	Southern Light Rail
SMEs	Small and medium-sized enterprises
SOAEL	Significant Observed Adverse Effect Level
SRLtH	Southern Rail Link to Heathrow
SSSI	Site of Special Scientific Interest
STEM	Science, Technology, Engineering and Mathematics
TA	Transport Assessment
TMP	Traffic Management Plan
UAEL	Unacceptable Averse Effect Level
WFD	Water Framework Directive
WHO	World Health Organisation
WPOZ	Wider Property Offer Zone
WRLtH	Western Rail Link to Heathrow