



Planning and Economic Development Policy Advisory Group

Monday, 9 September 2019 at 6.00 pm

Room 6 - Capswood, Oxford Road, Denham

A G E N D A

Item

1. Evacuation Procedure
2. Apologies for Absence
3. Minutes (*Pages 3 - 6*)

To approve the minutes of the Planning and Economic Development PAG held on 4 April 2019.

4. Declarations of Interest
5. Updates from Members/ Senior Officers on Current Issues
6. Response to Heathrow Airport Consultation (*Pages 7 - 34*)

Appendix (Pages 35 - 54)

7. Exempt Information

To resolve that under Section 100(A)(4) of the Local Government Act 1972 the following item(s) of business is not for publication to the press or public on the grounds that it involves the likely disclosure of exempt information as defined in Part 1 of Schedule 12A to the Act.

Paragraph 3 Information relating to the financial or business affairs of any particular persons (including the authority holding that information).

8. HS2 Project Update (*Pages 55 - 64*)

Reasons for restriction: Paragraph(s) 3

Note: All reports will be updated orally at the meeting if appropriate and may be supplemented by additional reports at the Chairman's discretion.

Membership: Planning and Economic Development Policy Advisory Group

Councillors: J Read (Chairman)
G Hollis
J Jordan
M Lewis
G Sandy

Date of next meeting – Monday, 27 January 2020

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PLANNING AND ECONOMIC DEVELOPMENT POLICY ADVISORY GROUP

Meeting - 4 April 2019

Present: J Read (Chairman)
G Hollis, M Lewis and G Sandy

Also Present: D Dhillon

Apologies for J Jordan
absence:

135. MINUTES

The minutes of the Planning and Economic Development PAG held on 7 March 2019 were approved.

136. DECLARATIONS OF INTEREST

There were no declarations of interest.

137. UPDATES FROM MEMBERS/ SENIOR OFFICERS ON CURRENT ISSUES

There were no updates.

138. COMMUNITY INFRASTRUCTURE LEVY (DRAFT CHARGING SCHEDULE)

The PAG received a report which sought Portfolio Holder authority to publish and consult on the Community Infrastructure Levy (CIL) Draft Charging Schedule; to submit the CIL Draft Charging Schedule consultation documents and any responses to an independent examiner for public examination; and to delegate authority to the Head of Planning and Economic Development, in consultation with the Portfolio Holder for Planning and Economic Development, to make minor editorial changes and corrections to the CIL Draft Charging Schedule and supporting documents.

Formal consultation was a prerequisite in the pathway to adopt CIL, the Draft Charging Schedule of which would be independently examined and the findings would determine whether the Council can adopt CIL.

The following points were discussed:

- The adoption of CIL by the Council would enable developments that did not currently pay an infrastructure contribution to become subject to a non-

negotiable charge which would be used to fund infrastructure. The CIL Draft Charging Schedule would be issued for a 6-week period of consultation in alignment with the timescales associated with the development of the Joint Local Plan, although there was the possibility of CIL coming in to effect earlier than the Local Plan.

- There was a prescribed process and as such the Draft Charging Schedule must be consulted on and submitted for independent examination. The first stage of consultation ended in December 2018 with 56 responses and 99 individual comments received from a range of organisations and individuals in general support of implementing CIL.
- The rates remained the same as those consulted on in November-December 2018. The CIL proposals had been derived through a process which included an economic assessment of their combined impact with all emerging Local Plan policies; this included affordable housing and the viability of site allocations.
- It was clarified that CIL payments would be received by the responsible planning authority. Infrastructure priorities would be established and the Council would work in partnership with other authorities who were responsible for the areas identified. A proportion of the payment, 15 to 25% would go direct to the Parish Council.
- Opportunities were being explored as to whether independent examination could be undertaken in a different method to an Examination in Public as this could lead to a possible earlier date of implementation.
- Section 106 agreements would remain for large developments. CIL was a mechanism to ensure infrastructure contributions were made for smaller to medium sized sites (under 400 homes or 10 hectares) without the protracted S106 negotiations. As noted, the Council presently receive no contribution from these developments.
- Best practice had been used when looking at viability with guidance from the NPPF and the methodology for coming up with the charges was sound and accurate.
- To significantly change the fees in the future, the same process of consultation and submission for independent examination would need to be followed. Inflation in line with BCI would be applied annually on 1 January.
- There was no definitive rule which stated that contributions must be retained for infrastructure use within the area of the planning application.

RESOLVED

That the Portfolio Holder agreed:

1. That the Community Infrastructure Levy – Draft Charging Schedule be published and consulted on.

Planning and Economic Development Policy Advisory Group - 4 April 2019

2. That the Community Infrastructure Levy – Draft Charging Schedule consultation documents and any responses be submitted to an independent examiner for public examination.
3. That authority be delegated to the Head of Planning and Economic Development, in consultation with the Portfolio Holder for Planning and Economic Development, to make minor editorial changes and corrections to the Community Infrastructure Levy – Draft Charging Schedule and supporting documents.

The meeting terminated at 6.44 pm

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SUBJECT	Heathrow Airport Expansion Consultation
RELEVANT MEMBER	Cllr John Read
RESPONSIBLE OFFICER	Steve Bambrick – Acting Chief Executive and Director of Services
REPORT AUTHOR	Adrian Colwell and Sukhi Khull
WARD/S AFFECTED	Whole District

1. Purpose of Report

- 1.1 This report identifies the key planning and environmental (technical) issues extracted from Heathrow Airport's recent consultation- spanning 38 large documents and 17,000 pages. Given that this is a statutory consultation to seek views on its Airport Expansion Consultation (AEC), Officers consider it necessary for Members to have full sight of the subject matters, issues identified and necessary mitigation being sought (Attention is drawn to the technical notes at para 5.6-5.9 below).
- 1.2 Officers have worked in partnership with Bucks County Council (BCC), the Colne Valley Regional Park CIC (CVRP CIC), and other relevant Local Authorities who are members of the Heathrow Strategy Planning Group (HSPG), particularly the Royal Borough of Windsor and Maidenhead and Slough Borough Councils. These Authorities collectively form the North West quadrant area and hence have interrelated impacts and concerns.
- 1.3 Some subject matters such as landscaping and connectivity have led to Officers working in partnership with Slough Borough Council, the Royal Borough of Windsor and Maidenhead together with BCC and CVRPCIC to develop comprehensive solutions for this area.
- 1.4 HSPG has with its members support and appointment of specialists, interrogated the documentation to provide a collective response to Heathrow Airport Limited (HAL).

RECOMMENDATIONS:

1. That PAG consider and comment on this detailed report and appended table, which addresses issues and concerns for each chapter of the Preliminary Environmental Impact Report (PEIR) and other documents contained within the raft of consultation material. It should be noted that Bucks County Council will be addressing the subject matters which fall within their remit to a larger extent. However, Officers have worked with Bucks County Council and shared information. As such this report and table provides an overview of all the crucial matters.

2. That the PAG's comments be incorporated into the consultation response submitted by the Director of Services on behalf of the Council in consultation with the Cabinet Member for Planning and Economic Development.
3. That PAG consider whether the Council's response (report and annex) should be shared with HSPG, to form part of the HSPG joint Council response (a recommendation made by the Planning Inspectorate (PINS) to the HSPG, which is consistent with MHCLG guidance).

2. Executive Summary

Our Objectives

Our response to the HAL expansion proposal is to seek to:

- Minimise the impact of the development on the communities and businesses of South Bucks (and Chiltern).
- Ensure the expansion leads to the best development possible.
- Secure clear gains for local residents and businesses through the DCO and accompanying measures, that are monitored robustly.
- Secure sustainable development, that achieves modal shift so to ensure that the surface access strategy which supports Heathrow expansion leads to enhanced connectivity for residents and businesses and meet the targets of the ANPS.
- Development which is future proofed in addressing climate change.
- Work to secure local transport improvements in the Ivers, and specifically a commitment to work with the Councils to deliver the Iver Relief Road.

3. Reasons for Recommendations

3.1 The Heathrow expansion has significant implications for residents of the District and the view of the Council will be a significant issue that the Planning Inspectorate consider through their determination of the DCO application in 2020. The deadline for responding to the DCO consultation is 13 September 2019. It is the largest DCO application to date, proposing a major expansion of the airport with consequences for the District in terms of land use, transport and quality of life due to noise and pollution. All of which need to be mitigated where they impact on the District and the Ivers in particular. As such, it is necessary to respond and ensure the Council has sought the optimum mitigation from the likely impacts, should this DCO be

granted permission by the Secretary of State. Whilst the Director of Services has delegated authority to respond to consultations, in view of the significant of the proposals PAG is asked to consider and make comments before a response is submitted in consultation with the relevant Cabinet Member.

4. Content of Report

4.1 This paper sets out the proposed response to the HAL masterplan as follows:

- Section One – Overview and process
- Section Two - The Masterplan proposals
- Section Three - Issues of concern from NW quadrant
- Section Four - Points of clarification
- Section Five - Our 'Asks' and mitigations to the HAL Masterplan.

5. Section One: Overview and process

5.1. This section sets the context for the current consultation.

5.2. It should be noted that the Council is not the determining authority for this Development Consent Order application (DCO). HAL propose to submit the DCO application to the Planning Inspectorate (PINS) in mid- 2020, with its examination due in 2020/21 and a decision in 2021.

5.3. The DCO presents the end state of the development as proposed by 2050. Some elements of the DCO such as the third runway, re-alignment of the M25 and moving of the A4 (and the rivers) will be fixed, while some elements are covered by parameters - location of satellite and replacement terminals). The redline boundary for this DCO is therefore significant in size. HAL has considered the earlier recommendations on the scoping stage from the Councils and recommendations from PINS and has changed the study area maps. As a result, part of South Bucks is directly covered by the area defined in the DCO.

5.4. South Bucks is affected by the initial construction period, as well as the phasing of the overall development and the land use proposals for what HAL call the 'North West (NW) quadrant'.

5.5. This Consultation includes a suite of 18 core documents (and other detailed supporting documents), such as detailed data and technical reports (e.g. Preliminary Transport Impact Report, Code of Construction Practice Document), and also documents covering Compensation and Mitigation Proposals, Property Guide and Policies, and a Strategy for Managed Growth.

5.6. As part of the DCO application HAL are required to undertake an Environmental Impact Assessment (EIA). Part of this process is the publication of early findings in a

preliminary environmental impact report or PEIR. The consultation documents reflect the current stage in the design process and understanding of baseline conditions, allowing for conclusions as to the likely significant effects to be drawn.

- 5.7. This complements, but does not necessarily follow the master plan. HAL has incorporated the PEIR into "Consultation 2" which ends on the 13th September 2019.
- 5.8. The Airports National Policy Statement (ANPS) June 2018 provides the primary basis for decision making on development consent applications for the airport expansion, which is the primary objective of the DCO Project. The ANPS sets out EIA principles in relation to the DCO Project. Specifically, the ANPS requires the EIA to identify, describe and assess effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them
- 5.9. In accordance with the Department for Communities and Local Government's (DCLG's) EIA Planning Practice Guidance (DCLG, 2017) and the Planning Inspectorate's Advice Note Seven: EIA: Process, Preliminary Environmental Information and Environmental Statements (Planning Inspectorate, 2017) the assessment has, and will continue to, focus on aspects and matters where a likely significant effect may occur; this approach ensures that the EIA process is proportionate and focuses effort in those areas where significant effects are likely.

6. Section Two: The Masterplan proposals

- 6.1. HAL is now proposing growth up to 2050 taking account of anticipated growth in passenger growth numbers and freight volume:
- Phase one 2026 – at current passenger levels, 72 mppa (million passengers per annum = mppa)
 - Phase two 2030 - 115 mppa
 - Phase three 2035 - 130 mppa
 - Phase four 2050 - 142 mppa

By 2035 cargo capacity is also forecast to have increased from 1.59 million tonnes per year to around 3 million tonnes

The DCO Project would enable Heathrow to deliver at least 740,000 air transport movements (ATMs) in 2035 and around 756,000 ATMs in 2050, subject to Heathrow operating within set environmental limits.

Quadrants

- 6.2. The Masterplan is being considered by quadrants as stated above. The NW quadrant is the key one for the District, though there are points of concern in the

other quadrants in terms of timing and phasing of development, phasing and scale of car parking, cycling access, coherence of the green corridor etc.

6.3. As expected, with a 'redline of development' being confirmed, the focus for the DCO is now starting to be more tightly defined. This reduces the offsite provisions to a minimum. It is apparent in this consultation that HAL is looking to contain the development and land, making the airport site work harder through more efficient land use.

Development phases

6.4. The development is proposed to work through a phased approach, relating to passenger growth.

- Phase 1 by 2026 – will see the rivers and motorways realigned, third runway open, no new Terminals at this point. Improved access to Terminal 5 (T5). Immigration centre moved. In addition to A4, Northern Perimeter Road is retained at this stage, and disappears in later phases. Green Infrastructure to be in place (green loop etc i.e. external) after 2026 focus shifts to build within redline.
- (By 2027 - Piccadilly line enhancements complete, Elizabeth line operational, safeguarded Western Rail Link (WRL) and Southern Rail Link (SRL). M25 realigned, A3044 realigned, new bus priority and cycle on A4).

(By 2030 - new Stanwell moor junction and new Stanwell moor access, Southern perimeter Rd, southern access tunnel (assumed all vehicles at moment) and new access via A4).

- Phase 2 by 2030 (at 115 mppa) – to hit Airport National Planning Statement (ANPS) milestones for passengers and colleagues. (note: 'colleagues' is the term used by Heathrow to refer to its staff). Provide new Terminal capacity, T2 & T5 expanded, southern Parkway complete.
- Phase 3 by 2035 (at 130 mppa) - new Terminal satellite, northern Parkway to be in place.
- Phase 4 by 2050 (at 142 mppa) - T3 removed. New Terminal is open. Improved access to the north in the 2035-2040 period. No major surface access changes are anticipated as being needed from 2040 onwards.

6.5. The iteration of the Masterplan presented to HSPG in November 2018 was based on a plan to 2035 and handling 130 million passengers per annum (mppa). The AEC Masterplan is based on replacing Terminal 3 (beyond its life span) and to continue growth beyond 2035.

6.6. There are 4 key phases – Phase 1 (Opening Day for New Runway), Phase 2 (2030, 115mppa), Phase 3 (2035, 130 mppa), and Phase 4 (End state (no year given, but 2040 and beyond), 142 mppa).

6.7. As such the phasing of the Masterplan/DCO scheme is emerging, and it is clear that a number of elements will not be delivered until post 2030. Key elements of the phasing are as follows, (with associated facilities and development delivered around these phases):

- Phase 1 – new runway complete, railhead realigned, M25 works complete, rivers realigned, M25 access to T5 moved to south, expanded multi-storey car park on T4 long stay car park, Immigration Centre relocated to Hounslow.
- Phase 2 – northern apron operational 2029, T5 extension (X) phase 1 complete 2029 (extension to western side of existing terminal building), 1st phase of southern parkway complete 2029, southern road tunnel (SRT) complete, some extension to T2 complete 2031.
- Phase 3 – T5X phase 2 complete, T5XN (northern terminal satellite) phase 1, additional capacity to southern parkway, northern parkway open.
- Phase 4 – T5XN complete (17 mppa), T5X complete (20 mppa), T4 (remaining at 12.5 mppa), T2C and D complete (T2 – 52 mppa), T3 closed.

6.8. While phasing is clearly a necessary approach, and some flexibility essential/uncertainty unavoidable, it is perhaps an underlying reason why there has been is a lack of detail on elements of the scheme (e.g. road design) that will not be delivered for some considerable time, and there is a lack of clear rationale for some of the phasing (e.g. logistical, financing or other reasons).

6.9. The key issue is understanding and planning for the phasing, and how this will be managed through the DCO consenting process, how much detail is needed for aspects being delivered in the 2020s compared to those in later phases (2030s/40s). The expansion will be driven by growth of demand of passengers and largely managed through control of the number of air traffic movements (ATM) each year. HSPG and members will need to ensure that triggers and targets are related to successful performance and delivery of development, infrastructure and mitigation. A key concern is the timing of delivery of key infrastructure and mitigation identified by HSPG and the binding mechanisms on HAL, particularly the green and blue and transport infrastructure.

6.10. As such a robust phasing strategy with a clear rationale is required from HAL, setting out commitments on the delivery of key infrastructure and mitigation (to

note that the full set of infrastructure and mitigation requirements is not complete and will evolve until DCO decision).

6.11. The Expansion Scheme has the following characteristics and layout:

- The location of new runway 3 is to be a minimum distance from runway 2, for independent operation and parallel approaches. A taxi way is required.
- New aprons and satellite piers.
- Terminal 3 disappears in the medium term (old building), replaced by new expanded.
- What currently works well is to be made more efficient – e.g. handling cargo to East and aircraft maintenance and expansion to the South and West.
- 7 control posts are proposed as access points for logistics etc.
- The NW corner has a new railhead - freight rail access, logistics hub, fuel, (with issues for the Bucks Authorities).
- Transport changes are proposed where roads are severed by third runway – e.g. A3044 & A4.
- Passenger facilities to be close to public transport, Heathrow Express and Crossrail.
- Car parking consolidated to north, south west and south. To be well accessed from motorways. New transit links in to improve access for local communities.
- Issue of safe travel and transport corridors created for access. A focus on 'Active travel' as part of wider network around Airport.
- Impact on M25, realignment horizontally and vertically and rivers realigned and channelled artificially (with ecology impacts being monitored through the tagging of species to identify their movements, constraints etc. Their preferential conditions are to be mirrored, whilst underground/artificially lit, temperature controlled etc.).
- New hard surfacing, raised runway and new flood storage areas are proposed. Green Infrastructure corridors & green links between landscape and Colne/Crane Valleys is proposed.
- Landscaping to be reinforced as it plays a major screening role.

- Hotel & commercial areas to be close to transport – west and east campus and at Hatton Cross.
- Route from northern parkway is an opportunity to create a transit route, this is being considered for the southern parkway though enhanced green space is preferred.

Active travel and surface access

- 6.12. Some complex road junctions are approved, particularly on the M25 and access from the south-west to the airport, and M4/M4 Spur and A4, with large land take. These are also visually intrusive. The Council and HSPG are working with HAL and Highways England to understand and simplify this.
- 6.13. We have some modelling but it is unclear how and why decisions have been made on certain elements in terms of use and public transport access and the impact of those decisions, e.g. Southern Road Tunnel open to general traffic rather than just public transport and cyclists and the potential impact on the local road network, single carriageway with potentially no bus priority for A4 running parallel to new runway etc. No freight data has yet been published, a major issue for the surrounding road network.
- 6.14. Parking strategy and incentives to use parkway sites needs to be better understood. There is concern that the northern parkway is only expected in the long term and parking arrangements in the interim, with a continuing risk to surrounding Districts, such as South Bucks. Clarity is needed on the type and timing of transit link from the parkways to the terminals.
- 6.15. The Surface Access Strategy (SAS) needs to consider and mitigate the impact of additional traffic on roads much further afield than the immediate surrounding of the airport and which are generally the focus of the masterplan; a network approach (radial and orbital) rather than a 'spokes' into the airport approach is needed to managing traffic and providing public transport facilities to serve a wider 'campus' of destinations and connect stations, town centres, new/existing industrial areas etc
- 6.16. 30,000 Heathrow 'colleagues' (the term used by HAL for their staff) live within 10km of Heathrow, so an opportunity exists to secure active travel to encourage walking, cycling and bus use. From a heat map the majority currently live to the east & north east of Heathrow. But, as employment increases this will change and it does not appear that HAL have thought about what investment will be needed to improve access for staff from areas such as South Bucks. Investment in the north-south improvements between South Bucks and Slough, with the Iver Relief Road is fundamental to this.

- 6.17. The expansion is aiming for cycling to have 6% of mode share by 2040. 20% colleagues said they are interested. Again, no access improvements are proposed that will benefit South Bucks, or improve connectivity with Slough to the south.
- 6.18. HAL are planning to create separated cycle lanes alongside main road routes to Heathrow. This was a major issue raised in the first consultation.
- 6.19. HAL is aiming for a 'hub and spoke' pattern of improvements with a series of corridors for transport improvements all with bus and separate cycle lanes. This is proposed to only go out so far, e.g. to Slough with the aim of being safe from that point. HAL plan to introduce way-finding signage so there is 'confidence' about safe cycling from arrival at the corridor. No improvements are proposed to access into South Bucks.
- 6.20. HAL aim to work jointly with Councils to improve road junction safety, introducing bus stop bypasses and way finding etc. More detail is needed and specific improvements that will benefit the communities of Bucks/South Bucks are essential.

HAL Masterplan response

- 6.21. HAL propose enhanced provision at T5, with a central bus Strategic Road Network (SRN), way finding, to secure a 200% increase in provision. Provision should be as close to terminals as possible. Providing real time service information with improved access to local roads - bus priority, Southern Rd tunnel, bus priority on realigned roads, meeting disability standards.
- 6.22. There are 8 points where bus priority at junctions to be introduced. But they are all shown on the edge of the 'redline', so there is a risk of limited interventions. HAL is arguing looking 'end to end' on routes, but the draft DCO does not show this. Also looking at night routes to close service gaps, but without wider change will not be as attractive as could be.

Landscape strategy

- 6.23. Detail on the type of infrastructure and mitigation, where it will be delivered and when, and how it will be managed and maintained is still lacking and lagging behind the Masterplan. Greater clarity/ detail is needed on what is proposed by HAL for each land area shown for GI and mitigation to enable a judgement on the quality of mitigation/connectivity. Additional land areas need to be included for suitable connectivity improvements and comprehensive mitigation to be delivered. A comprehensive proposal for high quality management and maintenance (public and private land) is needed across the whole area around the airport, not just on individual sites. While Green Infrastructure (GI) is critical for all areas around the airport, there is a clear absence of proposals to the south-east.

- 6.24. A Green Belt (GB) Assessment has been presented and inevitably GB is proposed to be lost. HAL will need to demonstrate 'very special circumstances' have been met for this in the DCO examination. Whilst for the most part it appears that a robust methodology and approach has been taken, it is not clear how the Assessment has impacted on design and land use decisions. It has also been undertaken on a site by site approach. A more strategic approach and comprehensive plan is needed to achieve objectives to ensure the GB (and other open space including the CVRP) function is more accessible and more attractive as outdoor countryside/areas for recreation for local communities affected by expansion and for the capital.
- 6.25. There is a lack of information on plans to address flooding, air quality and noise management, land quality, waste and mitigation (to name but a few of the policy areas).
- 6.26. Followed the 2018 design approach to the natural environment and agreement of the NAPS; HAL has produced proposals that are designed to fit with 'National Park City' and 'Colne Masterplan' approaches.
- An analysis has been undertaken. The proposals are a mix of strategy & projects of different scales & periods. They have considered history, hydrology, geology and ecology, green belt.
 - Heathrow is constrained, so innovation in land use is judged to be the key. They are seeking an efficient land use, to be Sustrans resilient & integrated with local communities.
 - Seeking to be most sustainable hub airport, ensuring a smarter future. Aim to be - 'Smarter, Brighter and Greener Airport Region'.
 - HAL sees an opportunity for ending fragmentation of Green Belt, by designing one strategy for the areas with 3 focus areas, 13 pilot projects and a new 'toolbox'.
 - The 3 focus areas are Colne Regional Park, Harmonsworth country park, and Heathrow SW gateway.
 - The 13 pilot projects include a spotters hill (using landfill) in Slough and the Great Barn (Harmonsworth), a community garden, third space for passengers and green loop (20km) pathway circuit - art etc, carbon meadow (for carbon sequestration between runways) 1ha=2.5 tonnes carbon, tree planting campaign including transplanting as corridors of European protected species.
 - Implementation and maintenance will be key.

Land Use

- 6.27. The scale of development both within the Masterplan and outside is becoming clearer. There are a series of airport related development that are not envisaged to be within the Masterplan boundary and needs to be addressed. The HSPG has proposed a West London Joint Spatial Planning Framework to guide the planning of this wider 'related' development. The potential preliminary floorspace figures that need to be planned for are approx. 739,000sq.m of industrial and warehousing (148 sq.m additional to this being provided within Masterplan), 368,000sq.m of office (20,000 additional to this in the Masterplan), and 2,271 hotel rooms (7,400 additional in the Masterplan).
- 6.28. A key element of land use not addressed in the Masterplan or elsewhere at present is the re-provision of BA's headquarters offices (Waterside). It is understood that BA are separately pursuing several options, the only one appearing in Masterplan iterations so far is in an area shown to the south west of the airport in Spelthorne, delivered through a separate planning application. The scale of relocated use requires substantial planning and sustainable transport connections which are not addressed in the current masterplan. The HSPG proposed West London Joint Spatial Planning Framework might be the means to guide this development in the future.

Construction

- 6.29. The construction period of greatest interest is between 2022-2025 when the M25, M4 are to be moved, rivers redirected, new flood storage area built south of Richings Park and third runway constructed, all ahead of being operational from 2026. Construction does continue after 2026 but largely within the Airport area. The construction proposals provide details of phasing, identity of working sites and proposed code of construction.

7. Section Three - Issues of concern from NW quadrant.

- 7.1. In summary, unlike other neighbouring Districts, the direct impacts on South Bucks and Bucks from the land use changes are modest, but there are issues to pursue to resolve mitigation and opportunity. South Bucks/Bucks and Colne Valley have more to do working jointly to ensure the lver interests are championed and to secure a set of asks that mitigate impacts.
- 7.2. There are major changes proposed for the Slough zone, including the new runway and associated transport changes and Green Infrastructure all of which are to be completed by 2026. The realignment of the A4 and M25 is all in Slough, to the south of the M4 and of material interest to South Bucks/Bucks. We have a shared interest in what Slough support, what they don't and changes they propose.

- 7.3. New flood storage ponds are proposed south of Richings Park with significant landscape features proposed. We need to secure bunds on them to provide a noise and visual barrier to Richings Park and the Ivers from the third runway to the south of the M4. We need more detail given the challenge that solutions have not been presented that address the groundwater and alluvial flooding risks. They need to be in place to north of Heathrow with a risk of impacts on residential area of Richings Park, need for more detail and more intervention upstream. This infrastructure is to be put in place before 2026. There is also contaminated land on restored waste sites to be addressed. There is a problem of mix and we have not yet seen the modelling for surface, fluvial, ground water flooding. HAL need to justify their proposals and show a technical solution that works. Hydraulics are being modelled. There is also an issue with a lack of detail of the design of the covered river corridor. There are also biodiversity and heritage issues to address where the flood storage has to go.
- 7.4. Green infrastructure, north - south connections need developing to secure walking and cycling connections. It is not clear how 'net ecological betterment' has been addressed. No improvement to north-south green and other links are proposed by HAL between South Bucks/Bucks and Slough, in contrast with their proposals for the east-west. This means opportunities are being missed to create new links, such as to the Ivers and Pinewood from Heathrow and Slough. A green link over the M4 closer to Slough as would provide the opportunity forge better walking, cycling and wildlife connection and integrate with the existing footpath network.
- 7.5. A Rail freight centre is proposed south of the M4, south of Richings Park. We need more details about the site, it's layout, the volume of rail and road movements, the routing agreements and to know the proposed hours of operation, with the issue of light and noise to address. How does freight from railhead get to terminal/cargo? The proposal is for a call forward facility for 50 vehicles, consolidate and move forwards to drop off and improve efficiency and reduce volume of vehicles. To be kept on terminal side, using terminal roads, not off-site public roads. The absence of freight transport data means that the impact of HGV vehicles on local roads remains an unmitigated impact and material risk, particularly to the Ivers and Richings Park.
- 7.6. A transport corridor to Slough is proposed (with others to the north, east and south of Heathrow) as the zone for transport improvements. This presents an opportunity to push for transport improvements that improve the connectivity between South Bucks/Bucks and Slough with a spur off this corridor, to the Ivers. Slough are concerned at wider transport changes to the west of Heathrow that they see as worse than the current access.
- 7.7. A rationale for some of the transport proposals from HAL is needed as they are not currently clear. There is too much focus on Motorway and junction

improvements and not enough on local roads for example, changing to a single carriageway on the A3034 reduces its role as a public transport route and risks spill over impacts onto roads in South Bucks. The current HAL proposals seem to reduce access for buses with less direct connections from west, while the preferred route via the south of Heathrow will be long and congested; all of which disadvantages South Bucks/Bucks.

7.8. The HAL Masterplan proposes measures to secure modal shift to meet NPS targets, without the need for the Network Rail promoted Western Rail and Southern Rail link. HAL argue that as they are schemes promoted by Network Rail they do not need to feature in the Heathrow DCO. There is a risk that HAL detach themselves from influencing the two rail schemes by focusing narrowly on the Airport expansion itself. We have a major interest in ensuring that north-south connectivity is both retained and strengthened (linked to the Local Plan supported Iver Relief Road). We also have an interest in how the two schemes interrelate, their cumulative impacts (construction, noise, flooding, landscape impacts) and their impact/implications for South Bucks/Bucks.

Displacement effects and wider impacts

7.9. The DCO does not make provision for full replacement of the land used for commercial and hotel provision that is displaced. This is to be picked up through the HSPG promoted West London Joint Spatial Planning Framework.

7.10. As the DCO seeking to allow the expansion of Heathrow up to 2050, there is a jobs growth increase over previous figures which informed the JEBIS, hence the proposal for the West London Joint Spatial Planning Framework to consider the wider spatial planning issues and inform the next generation of Local Plans.

8. Section Four – Points of clarification

8.1. There are areas of the HAL proposal that are weak and do not appear to be fully policy compliant. These include the surface access strategy (where the focus is too much on cars, with less detail on cycling, walking, bus and freight movements; with the result that the projected modal shift is unconvincing). HAL consider the airport to have minimal impact on local roads and the DCO contain little mitigation for local roads.

8.2. The employee/colleagues' car parking will decrease significantly from 25,000 to date to 12,000 in 2040. There are proposals to charge for access into the airport, which will have consequential knock on effects to local areas, increasing the illegal carparking. This is already of serious concern to the Councils; however, the drop-in provision and charging can be expected to increase this, adding to the enforcement issues already encountered by the Council in South Bucks.

- 8.3. In addition, Green Infrastructure and landscape impacts are all disconnected. While HAL makes environmental statements to work on delivering modal shift, these are not committed to within the DCO, only references are made to these in its masterplan.
- 8.4. The proposed job gains and business impacts do not appear to have been addressed in a manner that is joined up with the planning issues that have been considered e.g. over displacements, the impact of the construction period on local businesses.
- 8.5. The scale of freight growth associated with the expansion has not been clearly addressed. It is a fundamental issue for communities outside the 'redline' and the capacity of the M4/M25.

Construction period

- 8.6. There is a need for more attention being paid to the initial construction period, as once the DCO is passed by PINS 2021/2 (and assuming no legal challenge), the M4/M25 has to be moved and then built over and the River Colne put in a culvert ahead of runway construction for completion in 2026. This is a very quick construction phase and is the period of maximum disruption outside the airport itself. This is the period in which the new flood storage areas south of Richings Park will be built.
- 8.7. There is a risk that the DCO for the Heathrow expansion will make the existing problems of rat running through neighbouring Districts worse during the construction period for the third runway, up to 2026 as the red-line for the DCO is very tightly drawn with the result that it is not clear how the wider impacts, such as on the M25 are to be addressed. More congestion on the M25 will lead to more traffic using local roads to try to bypass transport bottlenecks.
- 8.8. The quantum of construction traffic has still not been determined and whilst HAL proposes to use rail freight to move spoil, more detail is needed to understand the movement strategy.

Code of Construction and land contamination

- 8.9. The Code of Construction Practice Document places emphasis on control of accidental spillages, managed stockpiles, excavation etc. (i.e. works), through contractual requirements. In terms of the flood storage areas, it is proposed to line the sites and provide vapour barriers via a maintenance strategy in agreement with the Environment Agency. There are various contractual or managing arrangements to be put in place and these are to be addressed within a Materials Management Plan (MMP), which has not featured in this consultation. Hence this is a crucial gap in understanding how the works will be managed and monitored. There is also a

fear that there will be a number of contractors involved. The MMP will address construction flows, risks during construction, moving landfills, thought on how to reuse excavated material etc.

- 8.10. Mineral areas outside the redline are not being considered, however the DCO needs to consider the effect of the DCO on such sites. Significant effects need to be properly identified as part of the project. This is crucial to the airport operations and Duty to Cooperate requires consultation with recipient waste authorities.

Mitigation vs Community Compensation

- 8.11. It is essential that mitigation and compensation is clearly addressed by HAL in the DCO as direct impacts that should be mitigated and detailed in the DCO itself, not merely offered funding through a new Community Compensation Fund. For example, the known costs of long-term management and maintenance of the new green infrastructure and flood storage areas, e.g. south of Richings Park, need to be detailed in the DCO.
- 8.12. The new Community Compensation Fund should be used for matters which arise in the longer term or for matters for which the level of detail is currently unknown.

Compensation for residents and businesses

- 8.13. The compensation scheme that HAL propose for residencies and businesses is over and above the statutory scheme. There is a need for the compensation scheme, and the areas it relates to, to be considered more fully, not just in relation to the HAL expansion, but also the cumulative impacts of a series of major national developments that all converge on one small area - HS2, smart motorways, Western Rail Link to Heathrow and the HAL expansion. There is a need for further information on the Community Compensation Fund before HAL submit.

Noise

- 8.14. It is unhelpful that the DCO for the HAL Masterplan is being considered separately from the Independent Parallel Approach and other air related DCOs/consultations, so that the cumulative impacts of changes are not being addressed comprehensively and in a joined-up way. The DCO distances itself from addressing noise issues clearly by deferring to the ANPS which defines the basis for decision making and the noise policy aims for the Project.

Climate change

- 8.15. Tackling Climate Change is a key issue. The U.K. now has an objective set in statute to have a zero-carbon economy by 2050.

- 8.16. There is as yet no guidance or policy change to show how this will be achieved. But it is hard to see how Heathrow might be exempted from this, which will place the whole expansion under even greater scrutiny. HSPG needs to press for greater consideration of these issues as the expansion proposals evolve further.
- 8.17. While the HAL expansion would appear to be consistent (in broad terms) with the Airports National Policy Statement (2017), statute trumps policy statements. This has implications for their surface access strategy, use of materials, the Green Infrastructure Strategy all of which are the weaker parts of the expansion proposals.

Sustainable Development

- 8.18. Most importantly, the unclear use of Sustainable Development principles in the design of the Masterplan. Given the growing importance of this issue and the new national commitment to zero carbon by 2050, this is a matter on which the HSPG should look to give a particular push, as we would on development proposals we consider as Local Planning and Highways Authorities.

Renewable Energy

- 8.19. There is an unclear commitment to the use of renewable energy in the development proposal. One aspect of this which we think is worth exploring (if not done so already) is the interconnection between energy from waste and the relocation of the waste incinerator.
- 8.20. There is an opportunity to consider how heat might be captured to supply the new developments and the potential use of heat to the runway via pipes running beneath it, to overcome climate change and winter use restrictions, similar to the approach taken at the Edmonton incinerator where heat has been supplied to homes in the upper Lea Valley.
- 8.21. The relocation of the Grundons Waste Plan closer to the third runway is an opportunity to secure the same sort gain for Heathrow, but it is not clear whether this sort of opportunity has been explored.

Design

- 8.22. There is a lack of clarity on the design standards to be secured, an important issue for a project of national importance and 'gateway' to the UK.

Long term Maintenance

- 8.23. We need to see details of the maintenance strategies proposed for the FSAs that are to be created and how they will be managed and funded over the long term, to avoid these costs falling on the host authorities.

Conditions

- 8.24. The HAL expansion is long term, up to 2050, so how planning conditions are monitored and enforced is a key issue. This needs to be detailed in the final DCO that is submitted. It is a complex area due to the mix of national policy and the local responsibilities of local government, spread across a large number of Councils covering the area affected by the 'red line' of the physical expansion proposal and the wider impacts.

Regulation

- 8.25. HAL have floated a proposal for a new body – the Environmentally Managed Growth Board to take over the regulation of environmental issues. There is concern that such a proposal may reduce the role of local government in monitoring environmental/environmental health concerns such as noise and air quality.

West London Joint Spatial Planning Framework

- 8.26. HSPG is working on the creation of a West London Joint Spatial Planning Framework to guide the process of securing the wider gains from the proposed expansion of Heathrow, which do not form part of the DCO, including economic gains and other transport improvements within the region.
- 8.27. It will need to be aligned with the proposed Bucks wide Local Plan which is proposed to be developed by the new Bucks Unitary and be in place by 2025 and the emerging Ox-Camb Arc which covers Bucks. Coordination is needed. A statement of common ground on the West London Joint Spatial Planning Framework is due to be developed with member authorities. HSPG consider this to be an important tool given that so much land to be impacted is outside the DCO boundary.

Tackling cumulative impacts

- 8.28. There is a major challenge of major scheme coordination and their cumulative impacts on South Bucks. These include M4 smart motorway, M25 smart motorway, Crossrail and the Western Rail Link. These all have separate processes.
- 8.29. There is currently no obvious sign of coordination between the different development lead bodies on how these issues will be addressed. This is a role DfT should be playing with input from MHCLG and BEIS.

A Clear Vision

- 8.30. HAL need to set out a clear vision and objectives for their plans, which are then addressed through the scheme. There is a need for a statement of fit with national policies and a local gains statement as well as local impacts.

Health

- 8.31. The HSPG officer group needs to be kept in the loop to ensure that all themes consider all factors that shape health and well-being in our communities and not be restricted to air quality and noise. The baseline of health facilities needs to be established so to ensure that the future provision is accurately accounted for by area. The surveillance of impacts is required e.g. areas which might have culturally related high levels of lung cancer as a result of substance misuse (a known higher baseline) and infectious diseases resulting from air pollution will add to the need in an area. The Health Impact Assessment (HIA) criteria will need to be shared. We know that health inequalities are culturally diverse and certain groups have disproportionate health impacts either through genetics or through deprivation. Children, elder people and ethnic groups have varying degrees of vulnerability and a broad-brush approach to the assessment cannot be taken.

Construction compounds & housing

- 8.32. There is insufficient information as to how the construction compounds will be run, the scale of the work force and workers housed in caravans. The health effects/management and monitoring will need to consider the living conditions, the impact to physical health and welling being (mental health). Workers need to be included as a receptors within the HIA assessment process.
- 8.33. The impact of workers compounds on local services (doctors surgeries, bus routes with increased commuter numbers, schools/housing needs etc.) do not appear to have been addressed. At the Member briefing session held in South Bucks District Council by HAL, the representatives from HAL made it clear that the need for housing has not been discounted. Should such need emerge, the Councils would want to be made aware of the proposed locations. The Terminal 5 experience led to a rise in the number of houses in multiple occupation (HMOs). Planned housing growth should be shared by HAL.
- 8.34. The early compulsory purchase of properties in the vicinity of HAL in the first phase would free up properties for HAL's use. It has been indicated that not all housing acquired would be placed on the market in one go. This would be phased with a view to not disrupt the housing market. As such, these homes could be used to home workers. This has been indicated at some PEIR sessions, however this matter remains vague.

General Waste issues

- 8.35. The Grundons facility is proposed for relocation in the Slough Green Belt and the Colne Valley Regional Park/across from the SBDC boundary. The existing facility would be displaced as a result of the expansion proposal and therefore its relocation should be considered as part of the DCO.
- 8.36. The flood storage areas are proposed to be located on former landfill sites. The waste composition is currently unknown. It was indicated that excavated waste to deepen these sites for flood storage would be used to create bunds on site. This would act as a barrier and also reduce the need for this material to be moved via HGVs. However, whilst HAL is working with the Environment Agency, the nature of the waste material has not been determined or shared with South Bucks District/Bucks Councils. The current position remains as was at the Scoping stage.
- 8.37. Further detail is needed as the land quality data and bore holing exercise has not developed enough. More input from the Environment Agency would clearly be beneficial.
- 8.38. The cumulative effects of these DCO projects must be considered before the replacement of this facility can be justified, especially as it has been suggested that Lakeside takes all Heathrow's waste. It would be necessary for the applicant to demonstrate that a need exists in the region (i.e. whether there is a capacity gap in the waste industry to justify the need for such a new facility). There have been a number of waste infrastructure projects implemented in and around the South East and Thames Valley which might have sufficient capacity to fill. This information should be shared in the project evolution stages prior to the DCO submission. An alternative sites assessment and a justification on whether HAL is looking at distance (i.e. proximity principle) or whether it is looking at waste tonnage/management capacity- is unclear. It is unclear what assessment criteria are being applied.

Achieving a balanced development

- 8.39. We are not clear that the environmental, social and economic gains are going to be delivered in balance noting the aims of HAL's community and socio-economic assessments.

The Habitats Regulation Assessment

- 8.40. The Habitat Regulation Assessment and Appropriate Assessment is a matter of particular concern. It is not clear how HAL intends to meet its obligations under the HRA and the impact of growth on the Burnham Beeches Special Area of Conservation. The development of the Chiltern and South Bucks Local Plan with key bodies including Natural England has demonstrated the sensitivity of Burnham

Beeches to traffic growth. Even without any construction associated traffic or end user growth impacts from Heathrow expansion being taken into account, unacceptable air quality thresholds are modelled as being breached through cumulative impacts. This is expected to be an issue for Heathrow expansion.

Environmentally managed growth

- 8.41. HAL has indicated in this consultation and in the earlier Airspace Change Consultation that it proposes to have pre-construction (pre-third runway) early increase in flight numbers. This is not part of, or within the confines of the ANPS. This is of serious concern to the Council as it appears that HAL is proposing to deliver changes under different regimes and ahead of an approved expansion.
- 8.42. This is not credibly sensible or reasonable given that this would give rise to air emissions (with noise and air quality concerns) at the same time as HAL is undertaking construction of the third runway and associated infrastructure (with noise and air quality risks). Once the third runway is completed the expansion proposal aims to reduce surface access traffic and transport through various mechanisms proposed such as staff car sharing, active transport, buses etc. to meet the requirements of ANPS, whilst a rise in emissions will be acceptable in airspace terms. This is contradictory.
- 8.43. Environmentally growth overall is proposed within the consultation with no real mitigation committed to achieve it, as well as green infrastructure proposals outlined that are not within the DCO boundary and thus not a formal requirement for delivery by HAL as part of the expansion. Their likely implementation is therefore questionable. It is a long-standing principle of planning that identified impacts should be mitigated as a requirement of the consent and not left out of the formal approval to be addressed through vague compensation packages. The appended table explores these concerns further.

9. Section Five - Our 'Asks' and Mitigations to HAL Masterplan

- 9.1. The table below focuses on points that are specific to the South Bucks District and on which direct engagement with HAL is taking place to secure agreement. It is intended that the agreement on these specific items will form part of a Statement of Common Ground to be agreed between the Council and HAL in the months ahead and where appropriate, feature in the main DCO itself.
- 9.2. We are working in close collaboration with Bucks County Council and the development of a common position with Bucks and Colne Valley Park on package of mitigation and gains. We are also exploring how to develop a shared agenda with Slough on transport related matters.

9.3. There are also general issues that HAL are being asked to address detailed after the table. These are being fed to HSPG for use through the partnership responses to the HAL proposals, as part of a more assertive response by the combined Local Planning Authorities and Local Highways Authorities to the emerging HAL proposal to improve the quality of the development that results and that a significant level of mitigation and compensation is secured that ensures the impact of the expansion is addressed.

Issue	Next steps / Issues
1.Transport / Surface Access	
<ul style="list-style-type: none"> Contribution to the Iver Relief Road main sections E-W & N-S sections) to improve connections to Heathrow. 	<p>There remains uncertainty around Ridgeway Business Park and HAL's proposals for this site (although it has been shortlisted from the list of 300 sites to the final sites). Logistics impacts from the Slough boundary and increase in construction, will further contribute towards the rise in HGVs. HAL should specify its interest in this site clearly as landuse/operations will impact the road network.</p> <p>The Councils request transparency in this regard. All the proposals for South Bucks as specified in the Richings Park document will heighten the impact to the road network and therefore contributions will be sought towards the Iver Relief Road to mitigate these.</p>
<ul style="list-style-type: none"> Secure new bus link from Heathrow via Iver rail station to Iver Heath, and on to Pinewood Studios. 	<p>To address air quality targets secure 'green routes' with increased use of expanded, affordable, bus services (using electric buses only) and new park and ride provision.</p>
<ul style="list-style-type: none"> Ensure there is a transport connection to the proposed Slough Transport Corridor. 	
<ul style="list-style-type: none"> Provide clarity about the parking strategy as part of the phased development of Heathrow to ensure there is no displaced parking moving from close to Heathrow into South Bucks. 	<p>Is HAL still proposing to implement controlled parking zones around the airport? If so, the Ivers should be included. The existing problem is a displacement effect resulting from Purple Parking being moved from the Southall Gasworks site and</p>

<ul style="list-style-type: none"> • Because the third runway removes capacity close to the airport, where is the alternative provision to be based? • Undertake active enforcement of illegal parking in the Iver communities arising from displacement of parking at Heathrow. 	<p>insufficient capacity at Heathrow. SBDC and other neighbouring Local Authorities are receiving complaints and undertaking costly enforcement action. This problem will be exacerbated by expansion, with restriction of car parking at the airport. This problem needs to be addressed in advance of the Third Runway.</p>
<p>2. Environment / Green & Blue Infrastructure</p>	
<ul style="list-style-type: none"> • Secure implementation of joint position with CVRP, Bucks CC and Slough BC, including green routes, revised green bridge over M4 and investment in extended walking and cycling to strengthen connectivity, sustainability and commitment to community well-being. 	<p>Progress has been made on this and a collective effort has been made with partners to present to HAL and optimum solution of connectivity towards the western edge and within the NW quadrant.</p>
<ul style="list-style-type: none"> • Secure high-quality green infrastructure from new flood storage areas and bunds, e.g. new one to south of Richings Park, with planting on the bund and walking and cycling connections. • Explore potential of new flood storage area as a water park. 	<p>It is unclear what biodiversity offsetting is proposed in South Bucks. The Colne Valley Regional Park has a role to play, especially with its high level of community involvement.</p>
<ul style="list-style-type: none"> • Ensure visual impacts are effectively managed. 	<p>At the Scoping stage, only one viewing corridor was identified for South Bucks. An additional one was added after Officer recommendation close to the M4 (Langley and Iver boundary). In recent work requests following the PEIR consultation workshops, Officers have recommended that additional views be considered from Richings Park. It is necessary for HAL to consider the cumulative impacts be experienced by Iver residents with views in the direction of the</p>

	<p>logistics hub and rail head; the proposed EfW plant on the boundary of Slough and South Bucks and the works terminal proposed by WRLtH in Richings Park. Impacts need to be considered at construction and operational stages of HAL alongside these other proposals. HAL has also indicated a substation in South Bucks, which may mean pylons in Richings Park- this would be another visual impact which has not been clarified in the consultation.</p>
<ul style="list-style-type: none"> Secure active management of the visual, noise and air quality disturbance during the construction phase of the five flood storage areas proposed within South Bucks. 	
<ul style="list-style-type: none"> Secure additional noise monitoring receptors for placing near Richings Park, Iver Village and Pinewood for long term monitoring and enforcement. 	
<ul style="list-style-type: none"> Ensure the movement of aggregates associated with the construction and waste management avoids the South Bucks area. 	<p>Clarity on the composition of the former landfill site waste matter is required. Reuse of excavated material to be made known. Additional HGV movements to be indicated if the waste cannot be reused on site (for bund creation). Gases and AQ concerns based on what might be released from these sites needs to be considered. The excavation and FSAs heighten concerns for public health impacts.</p>
<p>3. Economy</p>	
<ul style="list-style-type: none"> Secure promotion to local communities of skills training for job sectors at HAL and in associated investments e.g. Green Infrastructure. 	<p>Other jobs will emerge as a result of expansion from Green and Blue Infrastructure enhancements for which maintenance and management will be required, air quality or noise monitoring etc. Putting appropriate training schemes in place now would prepare skilled staff to enter new jobs in a timely manner.</p>

<ul style="list-style-type: none"> Secure an increased promotion of skills at Heathrow and the 'learning to work' programme in local schools, from Primary upwards. Promote in all Bucks schools after April 2020 with the new Bucks Unitary. 	
<ul style="list-style-type: none"> Secure more extensive local promotion of the 'Jobs and career skills fair' held at Heathrow. 	
<ul style="list-style-type: none"> Secure promotion and targeting of the availability of, and access to, new apprenticeships into Bucks/South Bucks such as to the Amersham College and Sixth Forms. 	
<ul style="list-style-type: none"> Ensure the active promotion of jobs at HAL in local communities and improved awareness of the on-line HAL jobs portal. 	
<ul style="list-style-type: none"> Ensure the promotion and targeting of local SME attendance at the ED summit planned for November 2019. 	
4. Railhead	
<ul style="list-style-type: none"> Ensure the angle of gantry lights avoids being visible from Richings Park. 	
<ul style="list-style-type: none"> Provide a noise bund for screening at the north of the railhead site to protect Richings Park. 	
<ul style="list-style-type: none"> Provide greater clarity on the anticipated rail and associated road freight movements to develop the railhead following the initial 	

<p>construction park. Linked to this is the proposal for Sutton Lane in Slough to be designated as an AQMZ with HGV movement restrictions: Bucks, Slough, Hillingdon work on charging regime.</p>	
<ul style="list-style-type: none"> • Provide clarity as to whether the rail head at Thorney Mill Siding is to be used? SBDC do not wish to see HGVs increase in the District with a worsening of air quality. <p>Within the document - <i>“Buckinghamshire Minerals and Waste Local Development Framework – Minerals and Waste Core Strategy, Policy CS7: Rail Aggregate Depots and Wharf Facilities’, the following is stated: - “The Council will safeguard the existing rail aggregates depot site at Thorney Mill, Iver but will seek to ensure that applications for development or redevelopment will result in a reduction (from a baseline at 2012) in HGV movements entering and exiting the site.”</i></p> <p>Use of the Thorney Mill Sidings would need to be assessed as to its impact on the Green Belt and Colne Valley Regional Park.</p>	
<ul style="list-style-type: none"> • Provide clarity as to whether the Colnbrook branch line is to be used? And how will HGV traffic be managed? If brought forward by HAL, then local traffic implications would need to be assessed and local highway improvements agreed with Bucks CC. 	

5. Construction	
<ul style="list-style-type: none"> Develop and provide clear signage and advanced publicity for alternative routes to enable traffic to avoid the M25/M4 in the 2021 – 2026 period as the Motorway is moved, with those routes avoiding South Bucks. 	<p>More detail is needed on the landscape buffers and if they are intended to mitigate ground noise. Officers have anecdotal evidence that the current operation can be heard in Richings Park and the location of the third runway is likely to make this worse.</p>
<ul style="list-style-type: none"> Ensure there are clear and known routes to be used for all construction traffic for the different phases on the project. 	
<ul style="list-style-type: none"> Ensure the impact and disruption of the construction phase on local businesses is assessed and they are directly engaged to enable their effective future planning. 	<p>Address impact of Old Slade Lane being used to transport aggregate extraction south of Richings Park</p>

10. Consultation

10.1. Further to Heathrow's earlier two consultations (Consultation 1 and Airspace Change), it is now consulting on its masterplan proposals covering land use changes. This consultation on the Heathrow Expansion proposals is referred to as the Airport Expansion Consultation (AEC). This DCO consultation runs from 18th June 2019 to 13th September 2019.

10.2. A briefing by HAL for Councillors on the proposed Masterplan was held on the evening of 8th July at Capswood.

10.3. There were a number of drop-in consultation events held for residents as set out below. All Members were informed of these and the evening session via the Members Bulletin:

- Gerrards Cross on Tuesday 16 July 2-8pm at Colston Hall, 8 East Common, Gerrards Cross SL9 7AD
- Beaconsfield on Thursday 1 August 2-8pm at The Fitzwilliams Centre, Windsor End, Beaconsfield HP9 2JW
- Uxbridge on Tuesday 20 August 2-8pm at Brunel University London, Conference Services, Uxbridge Campus, Kingston Lane Uxbridge UB8 3PH
- Richings Park on Thursday 22 August 2-8pm, at Absolutely Fitness – Richings Sports Park, 34a Wellesley Avenue, Richings Park, Iver SL0 9BN

11. Options

There are no alternative options. The proposed Masterplan is the culmination of the consideration of prior evaluation and engagement with all surrounding parties.

The Authority has a duty to respond as a Local Planning Authority, though it is not the determining authority. The Council has previously demonstrated support for the HAL expansion strategy, whilst seeking mitigation on impacts identified (October 2018).

12. Corporate Implications

12.1. Financial- there are no immediate financial implications for the Council.

The list of 'asks' of HAL is intended to secure the necessary mitigation required for the communities directly impacted. The Councils are working with the Heathrow Strategic Planning Group (HSPG) and Officers time is reclaimed as part of the agreement and via HAL through their unilateral funding agreement with impacted authorities.

12.2. Legal – there are no immediate legal implications for the Council.

It is intended that the Council agree to a Statement of Common Ground (SoCG) with HAL prior to the Development Consent Order being submitted for determination.

13. Links to Council Policy Objectives

The Heathrow Masterplan has the potential to impact on the four objectives of the Council, given the scale of the proposed expansion and the community impacts identified.

The four key Council Policy Objectives have informed our approach to the Masterplan:

- Sustainable Environment
- Promote healthier communities
- Protecting our heritage
- Protecting our future

14. Next Steps

The Councils will continue to work with HAL, HSPG and partners (especially with Bucks County Council) to ensure that the impacts of the DCO benefit our communities and are mitigated. Compensation will be sought for impacts that emerge in the future, given the long-time frame of the DCO and which cannot be anticipated at present.

Annex	Technical Issues identified
Background Papers:	None other than those referred to in this report.

Annex – Technical Commentary on Airport Expansion Consultation: Masterplan documents

Chapter/subject and references	Assessment and issues arising
Landscape and visual amenity/Environmental matters	<ul style="list-style-type: none"> • The biodiversity chapter covers habitats/nature which contribute to landscaping and the community chapter covers the recreation and amenity receptors. The historic environment chapter covers the historic landscape, an important issue for South Bucks. • HAL has considered the earlier recommendations on the scoping stage from the Councils and recommendations from PINS and has changed the study area maps. • At the scoping stage, the normal 5km offset was in place (the then DCO boundary). This was extended out to consider local topography and now extends North to the Colne Valley, East to Richmond Hill, South to the edge of Chertsey and West to Lynch Hill. • HAL has considered published landscape material character assessments. • The zone of theoretical visibility (ZTV) has been updated to reflect the DCO at PEIR stage. Extra locations have been added-35-40km. Close views -metres of the red line boundary and those 10+km away. The chapter therefore covers a large spectrum. • Despite this, the redline boundary does not include open spaces/green spaces in the boundary and these are not assessed in the EIA process. High spec Green and Blue areas are excluded from the DCO boundary and landscaping and green infrastructure is fragmented as a result. The justification provided for this is that HAL will be seen to be taking control of an unreasonable amount of land when it doesn't need to. However, this provides no guarantee of delivery and the proposed green loop is reliant on individual landowners as not all parcels of land have been considered necessary for acquisition. • There are no biodiversity net gains proposed and the delivery of biodiversity mitigation (including for licencing) and should be included in the draft DCO order. • HAL considers the National Networks legislation assessment methodology-separate assessment of views from roads (i.e. transport network users) and the approach to light pollution is set out in a technical appendix. • At the scoping stage, PINS advised that an assessment in relation to tranquillity should be assessed in other relevant chapters (community, health, historic environment, noise, vibration). The noise and vibration chapter covers visual amenity and tranquillity effects in relation to noise. • Clarification on good design is required. • A Joint Statement concerning the quality of connectivity for active travel with green links has been drawn up by into a

	<p>comprehensive package by Buckinghamshire County Council and South Buckinghamshire District Council working with other relevant adjacent partners of Slough, Royal Windsor Maidenhead, and Colne Valley Regional Park. This proposal is a live 'ask' with Heathrow that all the partners are currently looking to secure through liaison in bilateral discussion as well as through the Heathrow Strategic Planning Group. This includes biodiversity, new and improved active travel connectivity, improved green belt, and multifunctional land uses.</p>
<p>Green Belt</p>	<ul style="list-style-type: none"> • The ANPS indicates that HAL should look to provide replacement or enhanced value Green Belt. • HAL consultation confirms that only flood storage with temporary mineral extraction and biodiversity enhancement is proposed in the South Bucks GB. • The South Bucks view on HAL Green Belt assessment of sites has been that the methodology is generally sound. But, there were main landscape, visual and Green Belt impacts in Bucks from uses and developments not included in the DCO including: existing uses at Ridgeway (Logistics Hub shortlisted by HAL) and Thorney Mill Sidings (potential rail to road construction materials terminal) where any new development would need to demonstrate it has no worse impact on Green Belt openness
<p>Noise and Vibration</p>	<ul style="list-style-type: none"> • The PEIR noise chapters do not assess impacts but attempt to explain to the reader why they are difficult to assess and outlines the barriers to assessment (CAP1616, ANPS). In order to establish the spatial scope of environmental assessment, the PEIR adopts what is termed a '<i>Rochdale Envelope</i>' or parameter-based approach and the ES will do the same. The Rochdale Envelope is an approach to environmental assessment that aims to take account of the need for flexibility in the evolution of detailed design, which is often required for complex infrastructure projects such as this, that have a long implementation programme. It involves the establishment of a maximum design envelope within which the final detailed design of the project will sit. However, any permission (whether in the nature of the application or achieved through 'masterplan' conditions) must create 'clearly defined parameters' within which framework the development must take place. It is for the planning authority in granting "outline" planning permission to impose conditions to ensure that the process of evolution keeps within the parameters applied and assessed. This approach is identified in the revised draft Overarching National Policy Statement for Energy (NPS) (EN-1) and the revised draft NPS for Renewable Energy Infrastructure but not the ANPS. Stakeholders need to be certain that the HAL DCO can be managed in this way, particularly as the design of Heathrow's airspace is evolving and the final flight paths needed to operate the expanded airport will not be confirmed until after the DCO has been granted. The PEIR states that "<i>It is for the Airspace Change Process (as set out by the CAA in CAP1616), not the DCO, to determine the approved design of the future airspace for an expanded Heathrow, and for any other changes that might take place</i>

	<p><i>before then. The DCO and ACP processes must remain individually robust and the DCO must not directly or indirectly constrain the Airspace Change Process. As the ANPS notes (paragraph 5.50)"</i></p> <ul style="list-style-type: none">• Heathrow's proposed noise objective was consulted on a part of the Airspace and Future Operations Consultation (January to March 2019). The Objective has been revised in response to consultation feedback and the revised objective is included in the AEC consultation document. At the time of publication, the Objective has not been adopted by the DfT. This needs to be carefully monitored because HAL are not likely to postpone their expansion programme pending DfT or national policy approval.• As final flight path positions are not currently available, the assessments in the PEIR are, and the assessments in the ES will be, based on 'indicative flight path designs' as specified in paragraph 5.50 of the ANPS. These will be based on 'test cases' drawn from the ACP process for PEIR and ES. Test cases are indicative airspace designs developed from a 'snapshot' early in the airspace change process. This could be interpreted as "salami slicing", a potential issue arising during Environmental Impact Assessment normally to avoid the need to carry one out. Stakeholders need to guard against the project being split into parts to avoid the need for a clear assessment before and after expansion.• The ANPS states that <i>'The noise mitigation measures should ensure the impact of aircraft noise is limited and, where possible, reduced compared to the 2013 baseline assessed by the Airports Commission.'</i> (para 5.58) (with reference to the 2013 baseline for the 54dB LAeq,16h noise contour assessed by the Airports Commission. LAeq,16h indicates the annual average noise levels for the 16-hour period between 0700 – 2300) (see para 5.58). Although acknowledging that this is an overarching policy requirement it shouldn't constrain the EIA process.• A Scoping Opinion was received from PINS on 2 July 2018. Chapter 17 Table 17.5 sets out the comments received in Section 4 of the Scoping Opinion ('Aspect based scoping tables') for noise and vibration. The information provided in the PEIR is preliminary and therefore not all the Scoping Opinion comments have been able to be addressed and will be only be addressed within the Environmental Statement (ES). Table 17.5 therefore describes, where possible, how the Scoping Opinion responses have been addressed in this PEIR. Officers would like clarification from HAL as to when this will this be completed.• The ANPS (at paragraph 5.62) states: <i>"The Government also expects a ban on scheduled night flights for a period of six and a half hours, between the hours of 11pm and 7am, to be implemented. The rules around its operation, including the exact timings of such a ban, should be defined in consultation with local communities and relevant stakeholders, in line with EU Regulation 598/2014. In addition, outside the hours of a ban, the Government expects the applicant to make particular efforts to incentivise the use of the quietest aircraft at night."</i> This assessment has been undertaken incorporating a set of indicative forecast schedules that assume a ban on scheduled flights from 23.00 to 05.30. HAL is asked to clarify "scheduled arrival and departure time".
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- Government noise policy relies on LOAEL and SOAEL values). A description of how the LOAEL, SOAEL and UAEL values have been set for the PEIR and ES assessments are provided in Appendix 17.1, Annex F (see Tables 17.1 and Table 17.2 , which reviews policy requirements, precedent set by previous projects, as well as guidance and standards. This evidence review has also fed into the consideration of the setting of LOAEL, SOAEL and UAEL values for the assessment. HAL should clarify how UAEL fits with Government noise policy and explain how anyone can live in a noise environment which is unacceptable.
- Clarification is needed of how often the worst case scenario map showing adverse impacts in Iver, Stoke Poges and Taplow is likely to occur.
- The PEIR lacks any detailed construction impact assessment.
- Although not part of the PEIR, table 11.1 unlike the HS2 project, the CoCP does not set set LOAELS and SOAELS for construction noise however it does set similar trigger levels for Noise thresholds suggesting the need for noise insulation/ temporary re-housing. The reason for this should be investigated.
- The decision maker for any section 61 (noisy work) consents that are necessary may be determined by a specifically constituted body set up for by the DCO, referred to as the Joint Planning Committee (JPC). The JPC would be a joint committee of all affected local authorities and would have the role of also discharging a number of the DCO's requirements. Section 61 consents would be processed within a set of parameters specified in the DCO. We need to monitor this carefully along with emerging other "protective provisions" measures likely to be agreed during examination
- Great store is placed on the emerging "Noise Envelope" as mitigation. Despite the fact that it is an integral part of the ANPS it cannot be relied upon because it does not yet exist.
- The PEIR says that the CAA were supportive of the proposed approach to using WebTAG to inform the noise assessment, in relation to 1) using WebTAG to help 'calibrate' the combinations of assessment primary factors (level of exposure, level of change and size of population affected) that are being used to identify likely significant effects (adverse and beneficial); and 2) using WebTAG to monetise the noise benefit as part of the cost benefit analysis of noise control options. This forms part of Heathrow's proposed approach to evaluating noise control options in terms of both EU598 and the second aim of Government noise policy (para 5.68 of the ANPS). However, it should be remembered that WebTAG is an appraisal tool not an assessment tool.
- New and altered roads, and increased freight movements should also include vibration and ground borne noise to be assessed for potential impacts in Table 17.9. Railway noise is identified as a relevant noise source, but no results are presented for this, and therefore significance of effects are not identified, but it is identified as being low risk and will be assessed in the ES.

- There does not seem to be a construction activity for tunnelling and bridge works, which would include piling and tunnelling plant. (refer to 17.5.8)
- Noise levels from combined noise sources should be quantitatively assessed, at least for operational combined sources (road, rail, aircraft and stationary) and construction combined sources. Part of the assessment compares the project against noise impacts from 2013, noting reductions in numbers of properties exposed. This ignores that noise levels have reduced from 2013 and the comparison with 2013 has the potential to hide increases in noise which would occur with the project.
- The proposed sleep disturbance criterion is confusing. Aircraft L_{Amax} criterion (with estimates of potential number of events similar to rail criterion) for LOAEL, SOAEL and UAEL should be added and assessed. The difficulty as we understand it is not to set a criterion, it is for HAL to predict the L_{Amax} level when different flight paths may be used (which is the same as trains on different tracks). We have concerns about considering noise insulation as an embedded mitigation (what about outdoor amenity?) and noise benefits are identified as a result which is down only to provision of insulation. It should be noted that all the LOAELs, SOAELs and UAELs are external criteria and even though the last line of defence is noise insulation, receptors exceeding the external criterion should be reported as having a residual impacted even if the noise insulation may mitigate internal noise levels.
- Noise control measures: All proposed noise insulation control measures in Table 17.22 should have the wording avoid (or prevent) adverse effects on health and quality of life at night (sleep disturbance) and daytime (annoyance) indoors. The daytime (annoyance) is not totally avoided and it is important that external daytime impacts that are not controlled are also appropriately reported.
- We would like the ES and the draft CoCP to include clear assumptions on what construction activities would be considered for night-time and which would be excluded from night-time works (such as piling activities). Also, specifics on proposed quieter plant and methodologies (i.e. bored, vibratory or Giken piling). There is no mention in the PEIR that reduction of construction source levels has been considered, it goes directly to barriers or noise insulation.
- 17.10.48 states "The 63dB LAeq,16h daytime contour and 55dB LAeq,8h contour shown on these Figures represent the levels above which government policy notes that adverse noise effects may start to be observed at residential receptors (Significant Observed Adverse Effect Level - SOAEL). This may start to be observed when exceeding the LOAEL. When exceeding the SOAEL there is a significant observed adverse effect.
- Further to 17.10.48, noise insulation mitigates and manage significant adverse effects as far as reasonably practicable, but they do not avoid all significant adverse effects there are still daytime significant adverse effects at outdoor living areas.

	<ul style="list-style-type: none"> • Figure 17.12 to 17.27 shows that there are test cases resulting in very high change in noise (i.e. >9 dB) in the northern parts (e.g. Slough, South Bucks District, Hillingdon, Ealing, Hammersmith and Fulham, Lambeth, Southwark). Officers would like to understand this more fully. • Table 17.28 and Table 17.29 specifies in the footnote that newly above SOAEL will receive noise insulation. There should also be a footnote about further actions for the newly above LOAEL, in cases where some may be expose to very high change in noise (i.e. >9 dB) and therefore exposed to a likely significantly effects (even down to a low population size). Table 17.13 states that these should be offered Voluntary Noise Insulation for aircraft noise if in the upper half of the LOAEL range. • The assumption is that all significant adverse policy effects can be avoided by provision of insulation and compensation, which presumes that 100% of people will take up the offer made. Is there a risk of residual significant effects should people not take up the offer? • Where properties have previously been insulated and the project predicts a further noise increase, should the assessment consider the additional impact on these receptors as needing further insulation/mitigation, or would these additional increases be another residual effect? • It is recognised that '<i>Precise flight path designs can only be defined at a later stage after detailed airspace design work has taken place</i>', and that the '<i>assessment of aircraft noise should be undertaken in accordance with the developing indicative airspace design</i>'. This makes the use of WebTAG problematic because with scheme and without scheme cases cannot be defined with any degree of certainty.
Health	<ul style="list-style-type: none"> • Officers agree that the WHO definition of health is the most appropriate for the DCO assessment considering physical, mental and social wellbeing (section 12.1) and all relevant topic chapters (11 in total) have been identified in the health chapter section. This recognises the wide range of determinants of health that are present, and which need consideration in the assessment (section 12.1). • The review of legislation and national planning policy undertaken considers the most relevant documents for the DCO (section 12.2), the review of regional and local policy is considered appropriate (section 12.2), the baseline data collation at local authority level is adequate and provides a good overview for each of the 10 local authorities, the health effects identified are comprehensive (section 12.4) and it is agreed that health inequalities may arise in relation to the different population groups (apart from people in close proximity to the location, see below) identified and that their vulnerabilities need to be considered separately in the assessment as well as the general population (section 12.4). The assessment years for different health effects are well justified (section 12.4) and the embedded environmental measures identified are comprehensive and well signposted to the assessment topics from which they

	<p>originate (section 12.5)</p> <ul style="list-style-type: none">• Is it correct to consider people in close proximity to the location of changes as a result of the project as a 'vulnerable group' given that they do not fit into the usual definition of 'vulnerable group' and may distort the results of the assessments? Should they be considered as part of the general population category? From an equality's perspective, factors that influence health and wellbeing within the affected population vary by age, gender, ethnicity, disability, income and social support. It is then the case that within the general population affected some individuals are more vulnerable due to the factors identified. Proximity to change is not one such factor.• The spatial scope is fundamental to the assessment. Although there are different study areas depending on the determinant of health considered and that the assessment is an amalgam of these study areas, core study area for the human health assessment should be defined from the outset. 500 metres should be the minimum distance in terms of identification of receptors.• It is not explained why the human health assessment methodology has deviated from the generic project-wide approach to the assessment methodology set out in Chapter 5: Approach to the EIA regarding prediction of impacts, considering specifically the magnitude of effects and the sensitivity of receptors as set out in Chapter 2. Prediction and applied as in Graph 5.4 3. Evaluation in Chapter 5. Instead, the assessment utilises different terminology in Step 1 and in Step 2 Framing Judgement of Significance brings into the assessment considerations which are questionable in terms of the value they add - consultation responses and policy context. These are considerations which should inform the development of the framework, but they are not key to the framework (as they maybe subjective and reflective of stances at a particular point in time or by a particular organisation). However, they appear to have been used to justify certain scores. Scientific evidence, baseline conditions and standards and controls are the three key considerations here. In Step 3 the categorisation of the significance of effects on human health appears to lose sight of the receptors and their sensitivity to change and Table 3.13 amalgamates a number of considerations together for categorising the effects and a statement is made that 'based on the categorisation of the health effects using the categories in Table 12.13, those health effects rated as 'major' (positive or negative) have been rated as 'significant' for the purposes of compliance with EIA Regulations. This statement represents a deviation from the normal approach is EIA as set out in Graph 5.4.3 in Chapter 5 where 'moderate' (positive or negative effects) are also significant. In terms of significance of assessment results this approach this downplays the significance of many of the effects identified. Can a fuller justification for the methodology framework adopted be provided?• Chapter 12 Vol 3 Appendix 12.5 Health supporting analysis sets out the detailed assessments that have been undertaken and then reported in the chapter 12 vol 1. The way the methodology has been applied does not follow a best practice EIA approach. By using symbol 'tick' against every consideration that describes the effect (Table 2.15 for
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	<p>example) and the categorisation of effects (Table 2.20 for example), the presentation is confusing and doesn't clearly cover positive and negative aspects of the assessments. Then in terms of rating of effects (Table 2.21 for example) no proper explanation is presented as to why for each type of human health effect particular scores have been arrived at. Can a clearer approach be adopted with a full justification for the health effect scores?</p> <ul style="list-style-type: none"> • The assessments are generic and do not specifically refer to the real receptors that are going to be affected i.e. those people currently living, studying and working in the area, and in particular any of the vulnerable groups. The assessment should consider these groups to ensure that every individual is catered for in terms of specific mitigation measures and ultimately adequate compensation if residual effects on such receptors remain significant. Many of these receptors are already identified in Chapter 11 Community but not transferred over into the human health assessment. • From the assessments undertaken it is unclear how unintended health consequences will be minimised and how beneficial health impacts maximised. No recommendations have been made in terms of any additional mitigation or enhancement measures to maximise beneficial effects. The weaknesses in the application of the methodology means that opportunities to deliver mitigation and enhancement measures have been missed and the areas to target have not been identified. • The assessment downplays the significance of many of the effects identified across the range of receptors identified, no additional measures are identified by the assessment and it is unclear as to which specific receptors are actually being affected. Can a commitment to providing this detail be provided for ES stage? • Aircraft Noise with its impacts on mental and physical health through sleep disturbance and reduction in well-being benefits/ tranquillity when using outside space including Country Parks. WHO guidelines emphasise the 'minimise new communities' principle. • Poor Air Quality from construction and displaced traffic has impacts on respiratory and other conditions specifically for vulnerable groups including the elderly and children walking to school • There is an increased risk of communicable diseases as a result of more international flights. • There is a need for funding to monitor local health outcomes (Ivers Parish) and include this in the DCO Order Requirements and Obligations.
<p>Socio-economics and employment</p>	<ul style="list-style-type: none"> • HAL's Business & Economy Strategic Framework for Heathrow has been published with the consultation. South Bucks is in the Core area of 9 Councils and all Bucks is in the wider sub regional assessment area • Commitments in HAL's B&E Strategic Framework apply to Bucks and opportunities include being part of Britain's global gateway, business contract opportunities, skills potential (local college engagement), innovation

	<p>opportunities to showcase and develop business further and construction opportunities.</p> <ul style="list-style-type: none">• Arup are developing a collective vision for the core group area around Heathrow. This will develop on the employment needs in the area and the objectives of the recently published Local Industrial Strategies to identify transformative growth opportunities emerging from expansion.• The DCO does not make provision for full replacement of the land used for commercial and hotel provision that is displaced. The HSPG has proposed that these are picked up through a West London Joint Spatial Planning Framework.• As the DCO is now to 2050, there is a jobs growth increase over previous figures.• It is important that the Economic Development Strategy is not simply produced to satisfy the requirements of the planning application. It needs to be a document that clearly sets out what is going to be achieved and how, with a detailed action plan and measurable outputs and outcomes set out. The strategy will need to acknowledge the variations across the Core Study Area, recognising that different approaches will be required in different areas and that the priorities for, and definitions of success, will vary by local authority. It will be important to demonstrate that the economic benefits will be felt across the geography and consideration should be given to some quick wins as well as longer term activities.• Buy-in to the strategy will also be key as Heathrow are clearing acknowledging that they will not be delivering all of the activities on their own. Concerns over the capacity of local authorities to take on more activities• Point 1.1.14 - Reference is made to the Heathrow Employment and Skills Academy placing around 500 people a year into employment. To fill the number of jobs to be created through expansion will require this figure to increase significantly. How will the Academy scale up to achieve this?• Point 1.1.4 SME Summit – this really needs to be part of a wider package of support for SMEs rather than a single annual event. What can be done to ensure SMEs are prepared and ready to supply Heathrow and its associated businesses? Has the impact of the SME summits been proven?• Point 2.2.3 - If people are opting to work for Heathrow rather than other businesses then this could have a significant impact on the performance of these businesses.• Point 2.2.4 - More detail is needed around the support for businesses forced to relocate. Is there sufficient space for them to move into? Will their employees want, and be able to, travel to the new premises? How can it be ensured that any relocation is as painless as possible – is there support available with relocation (financial, support with identifying premises etc)? Will there be a co-ordinated approach from all the local authorities in the core area? Will we know who is moving? Will we all be fighting over the most desirable businesses? What happens to the rest?• Section 3 - Need to recognise not only the significant variation between the districts within the core area, but also the
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	<p>variations within the districts themselves. The strengths, weaknesses, needs, priorities etc will vary and therefore there will need to be differences in the activities and approaches taken. What works in one district may not work in another. And the interventions that are needed in one district may not be required in another.</p> <ul style="list-style-type: none"> • Point 3.1.6 - As the Framework highlights, there are pockets of deprivation within the core area. These pockets, however, are not necessarily in those districts in closest proximity to the airport and may not be those areas most direct impacted by expansion. To some extent, the positive economic impacts of the expansion are there to mitigate the negative environmental impacts, but how will this be reconciled in areas where the economic needs may be less great and as an example, there are fewer unemployed individuals seeking and requiring the employment that expansion will create? Where there are pockets of deprivation, there are more obvious economic benefits – through job creation, training, upskilling etc. • In South Bucks, employment levels are high, unemployment is low, and residents are generally highly qualified. Therefore, as a district we will not solely be looking for job creation. The quality of the jobs and the progression opportunities will be more important. • Point 3.1.5 - The availability of labour can be expected to be an issue. Reference is made in the Framework to a significant number of jobs forecast to be created by 2040 irrespective of expansion. Will there be enough individuals locally to fill these jobs and the airport expansion jobs? If there isn't, then this could place greater strain on the local transport network or could encourage more people to want to move to the area for employment which then places a strain on housing and local services. • And are there enough local people wanting to work at Heathrow? Do these individuals have the skills needed? To train and upskill people will take time, and is there the capacity within local training provision to meet potential demand? Enough tutors? • Point 4.4.10 - There is reference to achieving diversity amongst the workforce in sectors where others have struggled. What will Heathrow be doing differently to mean they will succeed where others haven't? • Point 4.4.12 - Heathrow expansion is not the only major infrastructure project in this area over the coming years. Competition for construction workers in particular could be intense. That said, the suggestion of skills passports and encouraging infrastructure developers to work together is encouraging. How will it be ensured that longer term benefits are derived for the individuals employed during the construction phase, e.g. access to other opportunities? • Point 4.5.1 - More clarity is needed on apprenticeships and hopefully this will be provided in the development of an Apprenticeships Plan which is referenced. Will these apprentices be new members of staff or will they be existing? Is the 10,000 the only target or are there targets under this relating to level of apprenticeship, new staff/existing staff, diversity etc?
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	<ul style="list-style-type: none"> • Section 4.6 - Is the education area going to give any focus to the promotion of construction careers to school pupils given the immediacy of the roles to be created? • Table 4.1 - Should those young people in care be included as a target group? • Table 4.1 - The Framework recognises the role of parents as influencers but what activities will be undertaken to reach and communicate with parents? • Table 5.2 - Encouraging to see reference to business support under the supplier engagement section. • Compared to earlier sections, the information on inward investment, managing adverse effects etc seems somewhat limited. • Tourism – links should be encouraged with destination management organisations such as Visit Bucks. • Section 5.6 - Adverse impacts will not be limited to displaced businesses. These may be the most significant and obvious, but other businesses will potentially be adversely affected. For example, through increased competition for employees, impact from increased traffic movement to the airport (visitors, workers etc), disruption in the local area whilst construction takes place etc. • Accessibility will be an important issue – it is not easy and affordable for all people in South Bucks to travel to Heathrow, when on shift work and by sustainable means and South Bucks/Bucks are not being offered new transport links to improve this situation.
Historic environment	<ul style="list-style-type: none"> • Huntsmoor House should be considered as a country park/green and blue asset to develop the potential of its tourism and economic benefits.
Biodiversity	<p>In common with other topics the HAL consultation information is paradoxically both copious and lacking in survey info and conclusive assessment on ecology</p> <ul style="list-style-type: none"> • HAL have not undertaken (or published) ecology surveys for large areas • It is welcome that "Heathrow... are...committed to providing a biodiversity net gain" • The terms mitigation, compensation & offsetting are used inconstantly making it difficult to assess what must be provided in the DCO and what is additional • The location Plan confirms that some areas proposed for ecological mitigation and enhancement may be located outside the DCO application boundary. All areas proposed for ecological mitigation/ compensation should be included within the DCO application site to give control over long-term management and provide greater certainty that biodiversity net gain is achievable • It is of concern that Government in response to the Environment Bill that '<i>nationally significant infrastructure and net</i>

	<p><i>gain for marine development will remain out of scope of the mandatory (10%) requirement in the Environment Bill.'</i></p> <ul style="list-style-type: none"> • It is of concern that no fixed period has been identified for long term management of habitats • SBDC, BCC, CVRP CIC and neighbouring authorities including RBWM, SBC have worked collectively to provide HAL with a joint connectivity statement. This includes increasing the North- South connectivity to Richings Park and Iver Country Parks and securing key improvements such as a green crossing across the M4 and diverting the Colne Brook north of the railhead area (creating a connection further westward to that currently proposed). The aim/action required with this is to obtain comments from HAL and to secure this through negotiations in the Councils lists of asks. The partners stated above also wish for this to be included with the HSPG response to HAL on the AEC.
Waste	<ul style="list-style-type: none"> • Whilst rail transport is stated to be the first preference for off-site hazardous waste movements there is no information on how the material generated from the FSA (former landfills at Poynings and Thorney Park) will be transported from the sites/ disposed of removed from the overall Heathrow site? • A consent to replace the Grundon Energy from Waste facility is being sought separately under a standard planning application and permitting process to Slough and the Environment Agency respectively. The potential loss of the Grundon EfW capacity should planning be delayed or refused or construction and commissioning run past 2024 would present a sub -regional deficit in capacity.
Archaeology	<ul style="list-style-type: none"> • We note the Heritage England position letter sent to HAL setting out concerns on information provision and ability to alter design/ locations should nationally important archaeology be identified. Significant archaeology should be retained in situ, where possible and additional flood storage provided elsewhere, where possible.
Water environment	<ul style="list-style-type: none"> • One important feature of the current proposals is a reduced package of Flood Storage Areas (FSA) located in Buckinghamshire in the Thorney Park, Poynings and Huntsmoor Park areas. • There are concerns regarding the amount of survey information and conclusive assessments included within the consultation on ecology matters. HAL have not undertaken (or published) ecology surveys for large areas of South Bucks. There is also a concern about the inconsistent use of the terms mitigation, compensation and offsetting as it is not clear where, what type(s) or how much will be provided to meet the targets HAL have committed to. • It is welcomed that HAL are committed to delivering biodiversity net gain, given the exclusion of Nationally Significant Infrastructure Projects from the emerging Environmental Bill, but further detail is needed about how they aim to achieve this. • There is concern about the lack of published data and assessment information for flood. All of the proposed Flood

	<p>Storage Areas are included within the consultation, but the material lacks information about the known groundwater and waste issues at Poynings and Thorney Park.</p> <ul style="list-style-type: none">• The network of Green Infrastructure proposed as part of this consultation has limited scope into Bucks and is an area which should be further considered because of its significant potential to enhance the value of the Bucks Green Belt. The Airports National Policy Statement suggests that the Secretary of State will consider whether the applicant has maximised green infrastructure enhancement opportunities when assessing the application.• As part of the Green Gateway Legacy, BCC and South Bucks DC are working collaboratively with Colne Valley Regional Park, Slough Borough Council and Royal Borough of Windsor and Maidenhead to develop a more comprehensive network of active travel connectivity across the North Western quadrant of the proposed expansion area. This work seeks to improve the wider North-South connectivity network and provide HAL with a proposal to improve their current designs. This work also demonstrates how this joint proposal can contribute to HAL achieving the targets in the Airports National Policy Statement.• Flooding ponds are proposed south of Richings Park. We need to secure bunds on them. We need more detail given the challenge that solutions have not been presented that address the groundwater and alluvial flooding risks. They need to be in place to north of Heathrow with a risk of impacts on residential area of Richings Park, need for more detail and more intervention upstream. Needed before 2026. There is also contaminated land on restored waste sites. Problem of mix. Not seen modelling for surface, fluvial, ground water flooding. Need to justify and show a technical solution that works. There is an issue of lack of detail of design of covered river corridor. Also need to address biodiversity and heritage issue where flood storage has to go.• Methodology acceptable but HAL have not shown that the fluvial and ground water assessments are being modelled and assessed together• All options for flood storage are included in consultation• HAL preference for Poynings and Thorney Park is not set out in consultation nor that these sites have known issues with groundwater and waste respectively• HAL does not appear to have considered the need for low and high flow channels for the Colne and Colne Brook and the associated planting to create the required habitat• HAL proposals are contradictory proposing both a full lined channel and designs which allow groundwater interactions. Interactions are good for hydro morphology but may result in significant increases in pollutions risks in view of contaminated land risks• Little or no consideration has been given to the risks for human water supply abstraction which in view of additional airport or other growth poses a potentially significant cumulative risk.
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<p>Transport network uses</p>	<ul style="list-style-type: none"> • A Rail freight centre is proposed south of the M4, south of Richings Park. We need more details about the site, its layout, the volume of rail and road movements, the routing agreements and to know the proposed hours of operation, with the issue of light and noise to address. How does freight from railhead get to terminal/cargo? Proposal seems to be call forward facility for 50 vehicles, consolidate and move forwards to drop off and improve efficiency and reduce volume of vehicles. To be kept on terminal side, using terminal roads, not off-site public roads. • A transport corridor to Slough is proposed (with others to the north, east and south of Heathrow) as the zone for transport improvements, South Bucks/Bucks must be connected to this corridor, to benefit the Ivers. • A rationale for some of the transport proposals is needed as they are not currently clear. There is too much focus on Motorway and junction improvements and not enough on local roads for example, changing to a single carriageway on the A3034 reduces its role as a public transport route and risks spill over impacts onto roads in South Bucks. Current proposals seem to reduce access for buses with less direct connections from west, while the preferred route via south will be long and congested. • The HAL Masterplan proposes measures to secure modal shift to meet NAPS targets, without the need for Western Rail and Southern Rail link. HAL argue that they are schemes promoted by Network Rail. There is a risk that HAL detach themselves from influencing the two rail schemes by focusing narrowly on the Airport expansion itself. We have a major interest in ensuring that north-south connectivity is both retained and strengthened (linked to the Local Plan provided Iver Relief Road). We also have an interest in how the two schemes interrelate, their cumulative impacts (construction, noise, flooding, landscape impacts) and their impact/implications for South Bucks/Bucks. • The Councils primary transport concern is that both the construction and future freight movements at an expanded Heathrow will put further strain on this area. The 'No More Traffic Pledge' does not include construction activities. • It is disappointing that HAL don't include any of BCCs on local bus and active travel links • HAL consider Western Rail Link to Heathrow (WRLtH) is not required for or ahead of expansion capacity being released • No More Traffic Pledge does not include non-Heathrow site parking – which may impact Bucks through non DCO speculative parking sites. A £29 charge for passengers 'dropping off', and reduced staff car parking disadvantages the people of Bucks, who have limited transport alternatives. • The Ivers are already suffering from HGV movements on an unsuitable road network. HAL has not provided transport model results despite numerous requests. The consultation does not provide assessment of impacts on the Ivers. • Good that HAL considering a local Iver bus link but the width restriction needs to be addressed to ensure access. • The proposed bus connections to High Wycombe are proposed by HAL and could start in next year and benefit
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	<p>Beaconsfield</p> <ul style="list-style-type: none"> • HAL have proposed a 'hub and spoke' active travel strategy, with improvements on key routes ('commuter corridors'), but this does not currently include a route into south Bucks. The airport is an ideal distance from the Ivers for access by bike (for employees) • This is only a 'spine route' through south Bucks and would link into the National Cycle Network and existing PROW in the area; there is a potential route linking Heathrow to Iver Crossrail station and Pinewood studio • We would expect HAL to fund the installation and signage of the route to Iver station as well as necessary upgrades to the M4 crossing at Old Slade Lane
<p>Air quality</p>	<ul style="list-style-type: none"> • In terms of Air Quality in Iver there is a lack of detail. • It is essential that there is continuous monitoring outside schools and in Country Parks. Nitrogen Dioxide disperses quickly and a difference in concentration from traffic emissions is only noticeable a few meters from the roadside. Therefore, monitoring should take place in a location near roads that will see an increase in traffic. Dust monitors with triggers will be installed around the construction site. This is common practice for large sites. • (ref: 7.5) A number of diffusion tubes for South Bucks have not been included on the map. Diffusion Tubes numbered 28, 29, 30, 31, 32 and 33 must be added to the map. (see sheet 2 for 6 figure grid references and results.) The ES should include 2018 data. The ASR for South Bucks is available on the Council's website. • It is disappointing that HAL have not taken the opportunity to introduce Active Travel Routes from the Ivers to the Airport and to companies based at the airport for all staff working at that location. New cycle way and direct public transport links are essential. • On Air Quality and Odour there is a conflict between Heathrow Expansion in Your area and Air Quality Chapter (Point 163, 164, of Q and A). • In is mentioned in all the Heathrow Expansion in your area section including "Iver and Richings Park" that there will be increases in the concentrations of pollutants, but these are not considered Significant. All levels will comply with levels set by the Government. This has been oversimplified and misleading especially as the PEIR predicts that the Air Quality Objective will be exceeded in Iver in 2022. It is essential that the sections of the ES truly reflect each other and are not misleading. • Iver already suffers from a high percentage of HGVs travelling on Roads which are not considered appropriate. Those living and working in Iver are already lobbying for the reduction in the number of HGVs in the area. The introduction of more HGVs, even for a short period will exacerbate the issue and will have some effect on the health and wellbeing of the people who live in Iver. There is insufficient detail in the PEIR as to enable an adequate assessment of Air

	<p>Quality in Iver as HGV routes have yet to be identified. It is essential that the impact of HGVs on the area is reduced and a compensation package for Iver is provided. Clarification is required on whether Ridgeway Trading Estate will be used as a Logistics Hub and how material will be transferred to and from Iver and the Airport site.</p> <ul style="list-style-type: none"> Increasing the size or capacity at Heathrow will have a detrimental impact on air quality in an area already prone to significant traffic generated pollution- the criteria should set out to improve air quality locally and make clear that any deterioration would be unacceptable. Positive action to reduce air pollution is the only acceptable criteria, monetisation should not be considered an appropriate criterion. The geographic scope of any assessment of air pollution should include the full extent of the pollutant reach particularly when considering the impact of transport related pollutants. HAL is asked to ensure that the proposals include all impacts beyond the curtilage of the airport and that communities are not excluded on the basis of assumption. Residents within South Bucks directly affected by the continued expansion and intensification at Heathrow are often told that they are not included on the basis of outdated information or assumption suggesting they will not be affected. HAL is using the 2013 baseline for airspace change. It is monitoring against its own standards for noise (loels and soels), Air quality (HULEZ) The monitoring tube data presented at the PEIR session indicated green markers- of no concern however these needed to be red. Air quality is addressed within the health chapter and is influenced by the surface access /transport matters. Matters that HAL needs to consider include the Iver AQMA and the cumulative impacts from the WRLtH project (and other committed developments).
<p>Carbon and other greenhouse gases/climate change</p>	<ul style="list-style-type: none"> The current Masterplan says little substantive about how the expansion addresses the challenge of climate change and is silent on its contribution to meeting the UKs commitment to be zero carbon by 2050. Sections 9.4.33 and 9.9.3 - note that the term 'mitigation' is not generally used in the PEIR and 'environmental measures' used instead. What is the rationale for using a non-standard term as it may serve to downplay the presence of impacts to be mitigated? Sections 9.6.3 - notes that reporting is largely aligned to the GHG protocol - in what respect is reporting not aligned to the GHG protocol and do HAL intend to align in full with the protocol going forward? Table 9.9 - what reasonable assumptions have been adopted in the absence of detailed design information? Section 9.9.4 states that the DCO project without mitigation scenario includes environmental measures that are part of the Masterplan. Does this include green and blue infrastructure? If so, many of the areas allocated for this purpose are not within the DCO boundaries and there is therefore no guarantee they can be delivered. The assessment may

	<p>therefore underestimate the greenhouse gas emissions in the worst-case scenario. A real worst case would only include measures which are guaranteed within the DCO application.</p> <ul style="list-style-type: none"> • Table 9.11 - continuing above comment, the table lists some embedded measures which have no substantive detail or quantification (e.g. is infrastructure for charging of electric vehicles at one location or ten locations?) In addition, some measures are aspirations rather than commitments (i.e. where possible, wherever practicable etc.), and should not therefore form the basis of a worst-case assessment. • Table 9.11 - continuing above comment, the table lists some embedded measures which have no substantive detail or quantification (e.g. is infrastructure for charging of electric vehicles at one location or ten locations?) In addition, some measures are aspirations rather than commitments (i.e. where possible, wherever practicable etc.), and should not therefore form the basis of a worst-case assessment. • General - Carbon mitigation measures proposed seem to be standard measures that might be expected for any new development. Does HAL have a proposed carbon reduction target figure to work towards, and what specific and cutting edge measures will the airport include to ensure that the development performs at a 'world class' level, particularly that Heathrow will be a major emitter in the years ahead? • Section 9.14.4 - The ANPS requires an assessment of whether project will impact UK's ability to meet carbon reduction targets. How has the definition of material change been defined and what are the parameters adopted? What is the justification for excluding international air transport (the biggest source of emissions by far)? It is recognised that aviation is excluded from UK carbon budgets but the question the ANPS poses is whether the DCO development would impact on the UK's ability to meet its carbon reduction targets (i.e. zero net by 2050) and not just carbon budgets, which surely it will? The domestic aviation assessment seems redundant when its contribution is negligible compared to the contribution of international flights. • General - currently the assessment focusses purely on Heathrow infrastructure, how will HAL influence the development of related airport infrastructure outside the DCO to ensure resilience to future climate change (e.g. green and blue infrastructure, ARD, community facilities, Lakeside etc). • Section 10.4.9 - 2050 has been adopted as the worst-case year for construction. Can more explanation be provided? 2050 may be the year with the greatest climate effects, but earlier years might be more intensive in terms of construction, or include particularly vulnerable construction activities? • Section 10.4.10 - Can there be more explanation of the 100-year timeline? Why is this most relevant in terms of the DCO project? Why not test 2050 when the proposals are in full operation? • Table 10.20 includes some measures which do not currently have any substantive detail or are aspirations rather than commitments. Will this detail be considered and applied at ES stage? Further consultation or engagement is required
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	<p>prior to the DCO/EA on these measures - when might this happen prior to DCO submission?</p> <ul style="list-style-type: none"> • Section 10.11.1 - the statement that all possible environmental measures have been included does not necessarily mean that an impact is not significant. Also, how confident is HAL that all possible measures have been identified as claimed? • HAL appear to be adopting a precautionary approach to severe weather events. This increases the importance of new flood attenuation ponds to be in the South Bucks area.
<p>Community Compensation fund</p>	<ul style="list-style-type: none"> • A requirement of HAL should be that it should have a viability review mechanism linked to the phasing of the masterplan to ensure that there is no early growth before runway 3. • Who will oversee the applications, who will have the stat power/liability/planning consents? • Details of the community compensation fund are required before submission to enable HSPG members to understand what its proposed.
<p>Accidents and Emergencies</p>	<ul style="list-style-type: none"> • The role of the Code of Construction Practice is currently high level and provides insufficient detail on measures to remove or reduce risks. • One collective HSPG concern is the risk posed by flooding and its release of pollutants should water ingress and egress landfill or other contaminated land • With the increased risk at take-off and landing, if areas of southern Bucks have new flightpaths or an increase in flights the risk profile will change.
<p>Cumulative impacts</p>	<ul style="list-style-type: none"> • The gaps in survey, baseline and assessment of most if not all topics make it impossible to conclude whether the methodology is robust and for example whether certain in combination and inter projects effects can be de-scoped • If good design was evident there would be less need for mitigation - exemplified by netted rivers and lack of integrated G&BI/surface access/biodiversity/historic landscape alignment. Compensation/mitigation not an alternative to good design with embedded provision. • Cumulative impacts are not being adequately addressed. Noise, pollution, gravel extraction/materials, construction, additional accommodation, ancillary and unrelated new development, illegal parking, traffic have significant cumulative impact. It is not clear that this has been properly considered and mitigated. • Challenge from the incremental loss Green Belt and its cumulative effects. • Noise from air increase, together with on the ground impacts needs to be assessed together due to its impact on communities. • Compensation is essential if 900 acres of green belt/green space/GI lost then it should be re-provided pro-rata as part

	<p>of the DCO process/obligations. There should be investment in existing GI/BI to make it more functional in context with Colne Valley Regional Park objectives.</p>
Construction	<ul style="list-style-type: none">• We need more detail of the Joint Planning Committee (JPC) proposed for the section 61 consents. The decision maker for any section 61 consents that are necessary will be a specifically constituted body provided for by the DCO. The JPC would be a joint committee of all affected local authorities and would have the role of discharging a number of the DCO's requirements as well as determining applications for section 61 consents within a set of parameters specified in the DCO.• We note that under the COCP 24-hour day, seven days a week working, including Bank Holiday working, will be required for activities directly related to ensuring that the new runway can be operational as soon as possible.

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