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Mr John Holland-Kaye  
Chief Executive  
Heathrow Airport Limited  
[by email: [feedback@heathrowconsultation.com](mailto:feedback@heathrowconsultation.com)]

Monday 9 September 2019

Dear John,

### **Airport Expansion Consultation June 2019 - Comments from Surrey County Council**

Thank you for the opportunity to comment on your preferred proposals for the expansion of Heathrow Airport. As indicated at our recent meeting, Surrey County Council's Communities, Environment and Highways Select Committee and Cabinet will not have had the opportunity to consider and agree this response before the consultation deadline of 13 September. However, as agreed, we are submitting this draft response to meet the deadline and if there are any subsequent comments to be made we will provide these to you by the end of September.

We recognise the importance of Heathrow's role in supporting employment for Surrey residents, generating investment in Surrey's economy and attracting business to locate in the county, but the environmental, surface access and other infrastructure issues associated with the expansion must be satisfactorily addressed. The anticipated impacts during both construction and operation of an expanded Heathrow will have significant impacts on communities, businesses and the environment in the county especially in relation to noise, congestion on the road network, air pollution, flood risk, the water environment and green and community infrastructure.

A particular concern is the potential cumulative impact on those Surrey communities of Stanwell and Stanwell Moor closest to the airport. The proposed Surface Access Strategy is critical, not least because increased traffic around the airport, especially heavier freight vehicles, could affect road condition and have maintenance implications for the council. We have considered the consultation documents in this context and in the county council's roles as the local highway authority and minerals and waste planning authority for Surrey, as a key infrastructure provider and with passenger transport and public health responsibilities.

Whilst we appreciate the substantial amount of work that has already gone into developing the preferred Masterplan and the engagement we have had with Heathrow Airport Limited (HAL) to date, we need to see more information, particularly on mitigation measures, to enable us to understand and develop an informed view of the likely environmental effects, especially in those areas listed above, construction, delivery and implementation and the health impacts on communities. Our response reflects this and our comments are less detailed than they might have been had the consultation been carried out when the proposals were more developed and more detail available.

It is a pity that even though the Heathrow Strategic Planning Group (HSPG) of which we are a member has been working with HAL for a number of years, a key premise of ensuring that a common

base position supported by appropriate detail could be agreed early on with HAL has not materialised as we are still awaiting much of the necessary detail.

We are also disappointed that the emerging preferred Masterplan, which will have very significant impacts on communities in Surrey, appears to lack ambition as regards legacy and benefits such as improved and subsidised public transport, active travel infrastructure, community and recreation facilities, skills training and enhanced or new green infrastructure. We are concerned that even some of the proposed benefits for communities and local businesses will not materialise given the recent CAA CAP1819 consultation. There is a need for further consultation with this council, HSPG, local communities and other stakeholders on surface access and mitigating the environmental effects as the scheme design progresses and we will continue to engage positively with HAL in this process.

Our considerable concerns over the preferred Masterplan and plans to operate and manage the impacts of the airport as it grows are set out in the annex to this letter. In particular, we wish to emphasise the following points:

1. Southern Rail Access is a priority infrastructure project for this council and will support economic and sustainable growth. A rail link is essential to achieve greater modal shift from the south and, in our view, if there is no fast and reliable public transport provision to Heathrow serving Woking, Guildford and other parts of Surrey plus the wider south east, HAL may not be able to meet their public transport targets. Furthermore, if HAL does introduce the proposed vehicle access charge without meaningful and attractive additional public transport provision from Surrey this impacts disproportionately on Surrey residents (apart from those very close to the airport) who have little other option but to drive/take a taxi to Heathrow unlike London residents who do have fast and reliable public transport alternatives.
2. As the local highway authority for Surrey, we continue to stress that we are not being adequately consulted on transport assessments or mitigation proposals. The scale of parking proposed in the Stanwell area and the creation of a main vehicular point of access to the airport in the south west have a number of critical implications for Surrey. Sharing of transparent, robust transport modelling as soon as possible is essential for us to enter into discussions with HAL around impact and mitigation. This has been raised consistently through our responses to previous formal and informal consultations and engagement with HAL at all stages of scheme development. In our view, given HAL's timetable, detailed discussion that remains to be held should be happening now.
3. Expansion provides the opportunity for proactive bus improvements which can be future proofed to ensure viable services if frequency, route and journey time can be relied on. The commitment to public transport improvements to the south and west of the airport needs to be stronger. We would like to see greater detail on what specific improvements are being committed to including on the level of financial support that will be available to ensure sustainability of services in the long term and how this will be governed. This funding and the means by which it is permanently provided needs to form part of the Development Consent Order (DCO). Surrey County Council should be included in discussions regarding future bus routes within the county.
4. The Committee on Climate Change (CCC) is expected to report in the autumn setting out its recommendations for the aviation sector consistent with delivering the Government's recently legislated target for net zero carbon by 2050. We expect these recommendations to be taken into account in the Government's final Aviation Strategy for 2050 and there may be a requirement for the ANPS to be reviewed. This is a key issue that HAL will need to address.
5. Air quality is an area of concern for the Council because of its impact on public health. The DCO boundary is surrounded by Air Quality Management Areas (AQMAs) and the whole of Spelthorne is an AQMA. The Stanwell area could be significantly impacted because of the increase in airport related road traffic to the south and west of the airport and construction activities but more information on transport modelling is needed to fully assess the impact on air quality. We would like to see HAL commit to supporting progressive reductions in air pollutants in areas currently below legal thresholds, not just avoid contributing to exceedances of maximum legal limits.
6. We would question whether the one hour recovery period for delays that HAL appears to be assuming as part of normal operations should count towards the six and a half hour scheduled

night flight ban period required by the Airports National Policy Statement (ANPS). We consider there should be a full six and a half hours when only dispensed flights would be acceptable rather than the currently proposed five hours and fifteen minute no operation period. The design of any noise envelope must go beyond maintaining the 2013 baseline and should be subject to regular review at least every 5 years given that noise metrics, understanding the physical and mental health impacts of noise and aircraft technology are continually evolving. The noise insulation policy should also be subject to regular review.

7. Early growth is dependent on the use of Independent Parallel Approaches (IPA) to allow more arrivals through the use of new arrival routes into Heathrow from the holding stacks. IPA is a serious concern for many residents of Surrey as it could potentially impact on areas of Surrey Heath, Woking, Spelthorne, Runnymede, Elmbridge, Epsom & Ewell, Mole Valley and Reigate & Banstead. This council does not support IPA as it would represent a worsening of the current situation for many local communities and could have health impacts. We do not consider there to be any national policy basis in either the ANPS or Government aviation policy for the more intensive use of the existing two runways to support early growth at Heathrow, but if early growth is to be allowed as part of the Development Consent Order (DCO), then it must be subject to noise management controls including no additional runway landings or take offs before 06:00.
8. We strongly disagree with proposals set out within the Preliminary Environmental Information Report (PEIR) to disregard aggregate recycling capacity at Hithermoor Quarry. Development in the vicinity of Hithermoor Quarry must allow for transport and processing of any future mineral extraction from King George VI Reservoir in accordance with the adopted Surrey Minerals Plan and we consider that any implications for the ability of Hithermoor to be used for the processing of material from King George VI Reservoir must be appropriately assessed.
9. We are very concerned that not all land to be assembled for necessary mitigation measures is included within the DCO boundary. The Masterplan includes various measures, particularly in relation to the provision of high quality, connected green and blue infrastructure and open space, which could provide quality of life and health benefits for residents in terms of leisure and active travel, however, the land identified for these purposes is outside the application boundary. There is no guarantee that this land can be secured through third party agreements and so there is a risk that not all of the Masterplan, especially some of the proposed mitigation, will be delivered which would be to the detriment of local communities.
10. The Wider Property Offer Zone (WPOZ) should be extended to incorporate the entire village of Stanwell Moor and large parts of Stanwell. There will be residents in these communities who will experience prolonged quality of life and potential health impacts given the long construction period by being exposed to temporary unacceptable levels of noise during construction. They will also be newly exposed to more aircraft noise from the expanded airport once it is operational, including from aircraft on the runways and taxiways as well as overhead and likely poorer air quality. We consider that there needs to be a local health impact assessment for each of these communities so that the combined and cumulative effects of HAL's proposals on residents can be understood.

Given the extent of our comments, rather than addressing the specific questions in the feedback questionnaire, we have presented them in the annex in terms of the relevant topics for the assessment of potential impacts and assessment principles identified in the ANPS. However, where possible we have indicated where they relate to particular feedback questions. We would also refer you to HSPG's response. We welcome ongoing dialogue with HAL (and through our involvement with HSPG) as HAL sets about finalising the Masterplan and DCO application.

Yours sincerely,



Colin Kemp  
Deputy Leader

## ANNEX

### Surrey County Council's response to the Airport Expansion Consultation – September 2019

#### **Surface Access** (Feedback questions 9-11)

The following comments on this topic can be summarised in five key points:

1. A firm commitment that HAL agrees the need for Southern Rail Access and will stand together with local authorities on the outcomes that we collectively wish to see delivered and pro-actively work with Government to deliver it. If a Southern Rail scheme cannot be delivered before the new runway is operational, we suggest a condition on the DCO that no more than 600,000 ATMs per annum should be allowed until both the Western and Southern Rail schemes are in place.
2. The need for more information and sensitivity testing of different interventions and assumptions that are being modelled to inform the iterative process of mitigation identification and to enable us to understand the likely impacts.
3. A stronger commitment to and more detail on specific public transport and active travel measures to the south west of the airport.
4. An urgent request to see the impact modelled of 'hard wiring' the Southern Parkway into the SRN.
5. A request to commence discussions on Controlled Parking Zones and how these will be implemented.

#### **General comments**

Surrey County Council wishes to raise a number of fundamental issues on HAL's work to date in relation to ANPS requirements. As the local highway authority for Surrey, we continue to stress that we are not being adequately consulted on transport assessments or mitigation proposals. The scale of parking proposed in the Stanwell area and the creation of a main vehicular point of access to the airport in the south west have a number of critical implications for Surrey. Sharing of transparent, robust modelling as soon as possible is essential for us to enter into discussions with HAL around impact and mitigation. This has been raised consistently through our responses to previous formal and informal consultations and engagement with HAL at all stages of scheme development. In our view, given HAL's timetable, much of the detailed discussion that remains to be held should be happening now.

The surface access proposals are highly focussed on meeting the mode share and colleague car trip targets of the ANPS, principally through limiting colleague car parking and introducing a vehicle access charge for passengers. As currently presented, they lack specific detail on how the airport's expansion will impact local transport networks and there is an absence of proposals for the provision of mitigation measures. It is stated that this information will be provided prior to the DCO in the Transport Assessment, but this document is not currently available and therefore not something that forms part of the consultation. Until we see the findings, including an assessment of committed mitigation measures, we are unable to give an informed view on the likely significant effects. In our view, the surface access strategy could do much more to facilitate sustainable travel within and across the Heathrow sub-region.

The public pledge on no more airport related traffic relates to an area that closely follows the boundary of the airfield. It excludes traffic generated by airport related development and supporting facilities located near the airport, but outside this boundary. This might include development displaced by the expansion itself. We consider that the no more traffic pledge should include traffic to and from any development displaced by the expansion and also construction traffic, particularly as construction traffic is included in the baseline and given the number of years over which construction will extend. The definition of through traffic is also a vital consideration and a clear definition needs to be established.

This same boundary applies to the definition of 'colleague' (airport worker). Such a narrow definition means that the forecast number of Heathrow colleagues that are subject to the ANPS travel requirements is lower. The definition of 'colleague' should be extended to include those working beyond the boundary of the airport in a role that is directly related to the airport, particularly if it is in a displaced activity. We support HSPG's request for a scenario to be tested within the surface access strategy that models the traffic impacts of the growth in employment outside the airport boundary that directly results from the airport's expansion.

Furthermore, we are concerned about the difficulty of clearly establishing the number of colleague trips in the base year, with the various surveys and MAID (access control system) data all measuring slightly different things. The lower the base means that the amount of colleague car trips that are needed to reduce to meet the ANPS targets is also reduced. Without clear evidence to the contrary, the base case number of colleague trips should be defined using assumptions that ensure the greatest absolute reduction in colleague car trips is tested.

### **Southern Rail Access**

Southern Rail Access was originally identified as needed to support T5 and the Airports Commission envisaged Southern Rail Access as an integral part of the surface access strategy for an expanded Heathrow. Given that HAL sees the expansion of Heathrow as 'a unique opportunity to change the way that people and goods travel to, from and around the airport', wants it to be at the heart of the rail network and as helping to facilitate economic development, we are disappointed at HAL's seeming lack of recognition of the importance of a Southern Rail Access to achieving these aims.

A Southern Rail link is a priority infrastructure project for this council and HSPG. We believe it should be a pre-requisite for expansion and remain committed to being involved in helping to shape the best possible outcome. Such a link will support sustainable growth and will radically improve access to Heathrow Airport from many areas. By improving connectivity to economic hubs in the sub-region, it will help both distribute the economic benefits of the expanded airport as widely as possible as well as helping to ensure that the airport can meet its obligations on traffic and air quality.

A rail link is essential to achieve greater modal shift from the south and, in our view, if there is no fast and reliable public transport provision to Heathrow serving Woking, Guildford, other parts of Surrey and the wider south east, HAL may not be able to meet their public transport targets. If HAL does introduce the proposed vehicle access charge without meaningful and attractive additional public transport provision from Surrey this impacts disproportionately on Surrey residents (apart from those very close to the airport) who have little option but to drive/take a taxi to Heathrow unlike London residents who do have fast and reliable public transport alternatives.

We would like to see a firm commitment that HAL agrees the need for Southern Rail Access and will stand together with local authorities on the outcomes that we collectively wish to see delivered and pro-actively work with Government to deliver it. If a Southern Rail scheme cannot be delivered before the new runway is operational then in our view, and having considered HAL's own growth forecasts, there should be a condition on the DCO that no more than 600,000 ATMs per annum should be allowed until both the Western and Southern Rail schemes are in place.

### **Traffic impact, modelling and local roads**

From the scheme development reports it is clear that transport modelling was not a key determinant of scheme design and only frequently referenced at a late stage in the process. As a local highway authority, we are very concerned by this approach and share the frustrations of HSPG's modelling sub-group around the lack of detail on what is being modelled and the lack of clarity around an agreed methodology. We remain concerned that there is insufficient information coming out of the modelling process to enable an audit of the assessment of the various scenarios and their impacts on Surrey's local road network.

Local authorities need proof of the robustness of the modelling, which includes greater clarity on the assumptions used. Without this there will remain disagreement over fundamental issues such as the proportion of traffic that is airport related and the extent of the impact on the local road network. Authorities are sceptical of the findings that just two network links will be operating in excess of capacity with seven forecast to be approaching capacity. We continue to seek clarity as to what sensitivity testing of different interventions and assumptions is being modelled. The HSPG transport sub-group has detailed specific assumptions that local authorities require sensitivity testing, which we fully support. These include the forecast proportion of transfer passengers, forecast number of airport workers, the impact of specific Surface Access Strategy (SAS) initiatives and growth in airport related traffic in the local area.

The Preliminary Transport Information Report (PTIR) contains no detailed junction modelling or microsimulation - just preliminary modelling of impacts on public transport and highway networks. Consequently, significant concerns exist as to how the iterative process of mitigation design will take place.

There remain fundamental queries around assumptions used within the modelling baseline, for example that less than 10% of total daily traffic on the majority of roads in the south west quadrant is estimated to be airport related traffic. Furthermore, preliminary modelling forecasts that there is to be little change on the highway network to the south west of the airport, with the majority of the difference occurring on the SRN, disregards growth in non-airport traffic in the local area, either due to induced or catalytic impacts of the expanded airport or for other reasons. Given the lack of capacity on the SRN for additional traffic, any increase in airport related traffic is likely to have significant local impacts. The consultation does not present any mitigation for these impacts stating that this will be part of the future transport assessment. We believe this is a serious omission from the current consultation, and that it is an important area of the scheme that is likely to require further consultation. As previously requested, we would like to see tested the scenario that the Southern Parkway be "hard wired" into the SRN, with no access to or from the local road network (other than for emergency access).

There remain significant concerns relating to the material reduction the proposed expansion will have on the capacity of the existing highways around the airport on the northern, western and southern sides. As they currently stand, the proposals result in the removal of much of the internal perimeter road network, and the replacement of a reduced capacity alignment of the A4. The A3044 replacement, whilst being of similar capacity (in terms of width), has a considerably greater design length, leading to longer journeys by all who use it. None of the new infrastructure provides discrete infrastructure for buses. By moving Airport Way and Southern Perimeter Road further south and increasing capacity to three lanes in each direction, there will be greater impact on the communities of Stanwell Moor and Stanwell due to increased noise and air pollution. Full consideration needs to be given to the location and access/egress for the relocated petrol filling station, which includes HGV facilities, to Stanwell Moor Road and any possible impacts on the Crooked Billet junction.

There are also elements of the scheme where we have queries around the 'buildability' of proposals, specifically at Junction 14. Space is limited for all the elements proposed here and we suspect that the Green Loop, an important green infrastructure element of the Masterplan and active travel corridor could end up being compromised. Greater assurances need to be provided that proposals are technically achievable.

There is a lack of detail on the quantum or impact of construction traffic, with no indication as to when this information will be presented. Insufficient justification has been given for the assumption that 60% of the construction workforce will travel by public transport.

Impacts on the local road network must be minimised and mitigated appropriately. Without sight of the full modelling data and assuming a worst case scenario of car access to and from the Southern Parkway via Surrey's network and to the Southern Road Tunnel and other hubs, we anticipate that mitigation may be required for a range of junctions and key links. Discussions around mitigation measures will only be possible once all modelling data is made available to assess performance issues associated with the expansion proposals. We have identified the following potential areas of significant highway impact:

- Junctions
- Horton Road with Junction 14 M25 roundabout.
- Spout Lane with A3113
- Spout Lane North with A3113
- Horton Road with A3044
  
- B378 with A3044
- Farnell Road with A3044
- A3044 with A30 (Crooked Billet)
- A308 London Road with Kingston Road, Staines
- A308 South Street with B376 Staines
- A308 Staines Bridge with B376
- A308 Staines Bridge with A320 Chertsey Lane (Egham Hythe)
- A308 with Fordbridge Road (roundabout)
- A308 with B378 School Road/Ashford Road signals
- A308 with Chertsey Road (Ashford Common)
- A308 with A244 Cadbury/Windmill Roads
- A308 with M3 with A316 with Vicarage Road with Station Road with Green Street (Sunbury Cross)
- B3003 with B378 with B377 (roundabout)
- A30 with B378 signals (Bulldog)
- B377 with B378 (roundabout)
- B377 with B378 (Signals)
  
- Links
  - A3044 from county boundary in the north to Crooked Billet in the south

It should be noted that a number of the “committed and planned improvements” listed in the PTIR are either already completed or understood not to be committed:

- Runnymede Roundabout was substantially completed in July 2018
- Meadows Gyratory was completed in May 2019
- A30 Crooked Billet Roundabout - we not received confirmation that Highways England has committed funding to construct this scheme.

### **Bus and coach**

We note that the SAS highlights that Surrey has the second highest share of passengers who would take public transport to Heathrow if access was improved. We would like to see explicit commitments from HAL that they recognise the value of investing in transportation assets and that much of this investment will need to be made beyond the airport boundary where journeys start and end. Where required, transport proposals should include detail on the level of financial support that will be available to ensure sustainability of services in the long term and how this will be governed. This increased level of funding and the means by which it is permanently provided needs to form part of the DCO.

Expansion provides the opportunity for proactive bus improvements which can be future proofed to ensure viable services if frequency, route and journey time can be relied on. The commitment to public transport improvements to the south and west of the airport needs to be stronger, with greater detail on what specific improvements are being committed to. Surrey County Council should be included in discussions regarding future bus routes within the county. These discussions need to take place now, well ahead of DCO submission.

We consider that dedicated bus lanes should be provided on all new highway infrastructure including Southern Perimeter Road and that more detail be set out on bus priority measures on the wider local networks. We support the recent route improvements that HAL have already put in place and the

proposals within the consultation. HAL must make the most of the opportunity to evaluate and report on the impact of any pilot schemes to demonstrate effectiveness to stakeholders.

We have specific comments on a number of route suggestions:

- Discussions are already underway around the funding of a more frequent service on the route 555 corridor. We believe that investment in bus priority measures, resolving on-route pinch points and making improvements to at-stop, on-bus and real-time information facilities on the 555 bus corridor would ensure this bus route is a reliable and attractive option for travel to and from the airport and would help to secure Heathrow's ambition for extending the frequency and operating hours for this route.
- We would support express bus routes towards Staines, Egham and Camberley and agree that these should take account of worker shift patterns. These routes should be open to the public too. There are currently no bus services between Egham/Staines and Heathrow between 00:30 and 04:00, which we would like to see addressed.
- We query whether new bus routes to Chertsey, Addlestone and West Byfleet have been explored? There is potential to consider the development at Longcross as a new public transport destination.

We would like to see a commitment that bus and coach operators will not be charged to use the new Southern Road Tunnel and that access will not be exclusively to specific operators.

To support the proposals for longer operating hours on bus routes we recommend investment in waiting facilities for services at these times including lighting, real-time passenger information and personal safety improvements to access routes to/from the bus stops to maximise patronage at locations away from the airport.

Serving a polycentric facility like Heathrow with direct bus services is challenging as a degree of interchange is inevitable. We recommend key interchange sites are identified, including along perimeter roads to avoid travelling into terminals to change, and that they are set up with stop facilities to support interchange and are advertised as such. Preferably these interchanges would avoid the need to cross busy roads to change buses. We agree with HSPG that the Southern Road Tunnel provides opportunities to develop a Bus Rapid Transit system from the Central Terminal Area to the A30, with extensions provided through partnership with operators.

The consultation sets out the intention for bus and coach routes to remain free-flowing on specified key roads around the airport. The council is keen to work with HAL to identify additional locations that require improvements on Surrey's network. It is our view that works will be needed on routes farther from the airport to ensure bus reliability. We would also want to see a commitment that monitoring continues on these routes and that improvements will be delivered even if problems arise once operational that weren't identified through modelling. We see variable messaging signs as having a role in the future to turn general traffic lanes into priority lanes for buses (and potentially other higher occupancy vehicles) at times when traffic is not free-flowing.

We support HSPG's view that there should be more emphasis within the SAS on measures to subsidise public transport to the airport as a way of encouraging modal shift. We support an extension of the free travel zone.

On accessibility and inclusivity of public transport, we would like HAL to consider making specific commitments to improve audio-visual announcements on buses and to work with their own staff as well as operators to ensure all staff have training in assisting travellers with non-visible disabilities.

### **Active travel**

Surrey County Council is currently delivering £4.95m of sustainable transport infrastructure improvements through the Wider Staines Sustainable Transport Package (Staines STP) (delivery 2017-2020). The package includes improvements to passenger accessibility and waiting facilities at bus stops and the provision of off-road cycle infrastructure and controlled crossing facilities along a number of corridors within the Staines and Stanwell area.

Staines STP, which is majority grant-funded by the Enterprise M3 Local Enterprise Partnership (EM3 LEP), was also awarded £549,000 in funding from HAL through the Sustainable Transport Levy in 2016. The measures, of which a number have already been completed, improve southern access to Heathrow via sustainable modes along roads including A3044 Stanwell Moor Road, B378 Town Lane, B378 Park Road and A308 London Road. Elements of these improvements are expected to complement HAL's ambitions for the southern 'spoke' of an active travel corridor from Southern Perimeter Road into Spelthorne.

However, the Staines STP improvements will not deliver this in isolation and further spokes are needed to connect nearby areas of high Heathrow employee residency in Ashford, Sunbury and south Staines. The proposed infrastructure-related active travel initiatives within HAL's surface access proposals commit to nothing specific within this area, although there is recognition that existing infrastructure in Surrey must be improved to ensure end to end connectivity with the airport campus. As a general point, we therefore consider the proposals as being far too limited and lacking ambition and want to engage with HAL as to how the identified routes requiring enhancement can be defined and delivered as part of the surface access proposals.

We estimate some 4,000 colleagues live within cycling distance of the airport to the south. Key areas for improvements include:

- Extending the Stanwell Moor Road off-road facility north to connect with the perimeter facility orbiting the airport (this was previously not undertaken due to the anticipated changes to the road network around the airport)
- Extending routes south of the A30 to south Staines, Ashford and Sunbury
- Enhancing the Park Road facility
- The southernmost portion of the active travel route on Stanwell Moor Road is not complete. We would also like this route to be well connected to the Southern Parkway.

(Please note that within the PTIR, volume 4 p24, the footpath across the eastern edge of Hithermoor is incorrectly shown as an off road cycle route.)

Some of the surface access proposals appear to imply that the cycle routes through the Northern and Southern Road Tunnels to the Central Terminal Area may not be implemented. We strongly support the inclusion of these routes and ensuring the design of tunnel creates sufficient space for a segregated cycle track. These should be open and available for use at the first phase of expansion.

We would welcome further information on the effectiveness of the cycle hubs at the airport. We consider that there should be permeability for cyclists to access the airport boundary at several points to undertake that last mile of their journey. Clearly security will be a significant consideration, but without this permeability of access, cycling will not be maximised as a potentially major contributor to sustainable travel.

It would be good to see cycle hub access linked to any smart card or upgraded staff pass, rather than requiring separate application. We also support suggested cycle share and bike hire schemes, which would be desirable to extend the worker residential catchment along the identified corridors. No reference to Docking Cycle Stations is made and Heathrow could be a candidate for such a system that would provide local community benefit. TfL run docking cycle systems and Slough have a similar system. If HAL proposed cycle docking stations for a radius of the airport, it could be managed by them similar to the London model.

Walking should also be seen as an important enabler for public transport and demand management. We support core walking zone proposals, but the zones look small and disconnected and we would suggest that they should include connecting routes between them to link them together and to the wider community. Given the high levels of traffic, green screens that offer some barriers to noise and pollution would be desirable. There is a need for enhanced walking infrastructure around Stanwell, which has a high concentration of workers and is within walking distance of the airport and the Southern Parkway for onward shuttle.

## Mobility information services

Surrey County Council supports the principles of improving knowledge of and confidence in sustainable journey options such as public transport, as a powerful means of encouraging modal shift. We note the low uptake of Heathrow's existing journey planner and suggest integration with third party apps and processes will be essential if the information is to reach the vast majority of prospective travellers. We suggest an open data approach will be important if data is to be incorporated into the widest possible array of third party travel tools, including technologies and services that don't yet exist.

We suggest that there is an opportunity to make use of existing smartcard technology which is familiar to members of the public and the technology is readily available to accelerate rollout and increase early user confidence in the product. It would be desirable to make enrolment for the Heathrow Travelcard automatic for new starters. Longer-term, the Heathrow Travel Wallet offers very similar functionality to emerging third party MaaS platforms, which may be better placed to reach a wider group of workers at Heathrow and be more appealing to those on short-term contracts who may use those other platforms across multiple job contracts. It would be positive to see a commitment from Heathrow to work with these products and integrate Travel Wallet incentives into them, where they can help Heathrow achieve its modal shift objectives

## Car parking

The proposals for an overall increase in car parking appears to be at odds with HAL's modal shift ambitions and we continue to query the scale of parking proposed at the Southern Parkway. The Scheme Development Report suggests that there was little traffic modelling evaluation during optioneering for the parkways. Given the potential impact on the local road network in Surrey, we consider this to be unacceptable and urgently request to see the impact modelled of 'hard wiring' or isolating access to the Southern Parkway from the SRN. We consider it vital that the Southern Parkway has restricted access off the local road network to any private car (other than at times of incident on the SRN).

The phasing of the parkways is a cause for concern related to the quantum of parking proposed in the Stanwell area. The Northern Parkway is due to be completed later, not only concentrating vehicular access to the south west corner for a period, but also negating any potential for HAL to provide only the parking that is required, as has been previously suggested.

There is a commitment to work closely with local authorities to manage any potential impact from unintended off-site car parking resulting from the parking restraints to be applied. There has been no engagement with HAL on this specific issue to date and we seek confirmation that HAL will fund extensive fly parking management measures as required, including drawing up and consulting on proposals, implementation (following this council's approval) and funding of their management in perpetuity so that residents do not have to fund an annual permit fee. This will need to be operational at the construction stage. Areas to include are:

- Stanwell Moor and surrounding roads
- Stanwell and surrounding roads
- Ashford – where transport links generate a demand for potential airport parking (both employees and travellers)
- Staines - where transport links generate a demand for potential airport parking (both employees and travellers)
- Any other areas that may generate hub related fly parking, for example around a public transport.

We expect HAL to monitor role-based parking space allocations to understand where types of roles that require cars tend to exist, what the barriers are to getting rid of cars and then targeting actions to transform those roles in association with employers. We support HSPG's view that the number of colleague parking spaces could be reduced further.

## **Vehicle access charge**

The council is supportive of the proposed vehicle access charge, but in common with HSPG, we would like to see it go further. HSPG believes the ULEZ and vehicle access charge should be payable by all vehicles accessing any part of the airport campus. Many local residents work at the airport and the Southern Road Tunnel could potentially turn into a local route if colleagues had permits or passes that allowed free access through Heathrow. There should be modelling of the ULEZ with and without colleague exemption. A robust plan needs to be put in place for preventing vehicle drop-offs and pick-ups to avoid the charge on roads close to the Parkways and thereby impacting on the local road network.

Surrey County Council support HSPG's position that the vehicle access charge should not be managed in a similar manner to the airport's existing revenue stream. Income from the vehicle access charge should be held in a hypothecated fund for supporting local transport infrastructure improvements and subsidising public transport fares. A democratic mechanism involving key local partners needs to be set up to help determine the spending priorities of this fund.

## **Freight**

Freight trips are forecast to grow rapidly in the south west corner of the airport. We need further details of proposals to ensure that HGV journeys to and from Heathrow are kept off residential streets and out of town centres such as Staines-upon-Thames. We support further investigation of Spelthorne Borough Council's suggestion of a non-road cargo link under or over Southern Perimeter Road to help reduce freight movements. Increased traffic around the airport, especially heavier freight vehicles, could affect road condition and have maintenance implications for the council.

We would like to see a firm commitment from HAL to support low emission freight vehicles. The whole of Spelthorne is an Air Quality Management Area (AQMA), where air quality does not meet minimum government thresholds. We urge Heathrow as a large-scale fleet operator to put itself at the forefront of the trial and development of low emission fleet vehicles, challenging the vehicle manufacturing industry to accelerate the introduction of viable electric and low emission vehicle products in support of the UK Government's Industrial Strategy and Road to Zero Strategy.

There needs to be a strong commitment to open data for transport and this is a particular issue with freight where information is not shared due to issues with commercial sensitivities. Sharing data is essentially the only way to understand the airport operations and propose suitable mitigation and we expect HAL to take a lead on this.

On vehicle call forward facilities, we would like to see the process for booking a slot at the cargo centre used to ensure compliance with vehicles waiting in the call forward facility rather than local streets. We suggest that the role of fleet-tracking GPS be explored to see if it offers any advantages to dynamically managing demand as well as ensuring compliance with no waiting on local streets.

## **Air Quality (Feedback question 13)**

The following comments on this topic can be summarised in two key points:

1. The need for more information on transport modelling to fully assess the impact on air quality.
2. The need for more information on construction to enable an informed view of the likely effects to be developed.

Air quality is an area of concern for this council because of its impact on public health. The DCO boundary is surrounded by AQMAs and the whole of Spelthorne is an AQMA. The Stanwell area could be significantly impacted because of the increase in airport related road traffic to the south and west of the airport and construction activities including the expected location of construction supporting sites.

The ANPS requires Heathrow to demonstrate that, with mitigation, the airport expansion scheme will be compliant with legal obligations that provide for the protection of human health and the environment. The air quality impacts of the expanded airport will largely depend on the surface

access proposals and so until more information is available from detailed transport modelling it is not possible to develop an informed view of the likely significant effects.

Currently, HAL's construction proposals are generally high level and are considered to be standard proposals expected to apply to any major construction project. Much detail still needs to be worked through and there are references in the consultation documents to workstreams and documents that will be submitted with the DCO. Again, until more information is available it is not possible to develop an informed view of the likely significant effects.

We are concerned that current assessments are constrained to breaches of limit values and that HAL seems to be pursuing a narrow focus on whether the proposals will create or delay compliance of air quality zones with legal limits. We would like to see the aim go beyond compliance and for HAL to commit to supporting progressive reductions in air pollutants in areas currently below the thresholds, not just avoid contributing to exceedances of maximum legal limits, given that initial results in the Preliminary Environmental Information Report (PEIR) show widespread and long term increases in air pollution around the airport. We would like to see a firm commitment from HAL to support low emission buses and freight vehicles.

Ultrafine particulate pollution from aircraft is now recognised as affecting lung health and particularly populations up to several kilometres downwind of airports. While no 'standards' exist for this pollutant at present, given the scale of expansion proposed, we would like to see the potential ultrafines emissions and impacts on local air quality be assessed.

### **Noise** (Feedback questions 6,7,8,15,16)

The following comments on this topic can be summarised in four key points:

1. Whether the recovery period should count towards the 6.5 hour ban period.
2. The design of any noise envelope must go beyond maintaining the 2013 baseline and should reflect sensitivity testing of various noise metrics and future fleet mix because of the impacts of noise on health.
3. The noise envelope should be subject to regular review at least every 5 years.
4. Any early growth must be subject to binding conditions to manage noise including no additional runway landings or take offs before 06:00.

### **Night flight ban**

We would question whether HAL is proposing a full 6.5 hour scheduled night flight ban. Whilst we acknowledge that HAL's runway alternation proposals could potentially give communities close in to the airport at least a 7 hour respite period (other than dispensed flights) between 22:00 and 07:00 it will include night flights on some days, and in areas further out from the airport up to the 4,000 ft contour (and beyond), which includes many parts of north Surrey, communities may not receive 6.5 hours without overflights (other than dispensed flights) during the night period. In our response to the Airspace and Future Operations consultation earlier this year, we commented on the fact that the runway time is approximately 15 minutes earlier than the scheduled time on arrivals and 15 minutes later on departures so that a 6.5 hour scheduled night flight ban means local communities could actually experience noisy overflights for a shorter period.

This is likely to have come as a surprise to many of the public, who may feel they were misled by HAL's Consultation One in 2018 where the main consultation document asked for feedback on the timing of the proposed 6.5 hour scheduled night flight ban in the night period but failed to make this clear. In this consultation we now learn that HAL is essentially treating the recovery period to deal with delays - between 23:00 and 00:00 (albeit with some restriction on numbers and types of aircraft) - as part of its normal operating day (Timing of Runway Mode Allocation Changes section in the Future Runway Operations consultation document). This means that the effective no operation period in which the only aircraft allowed to fly will be those that have been dispensed under the rules for exceptional circumstances actually lasts for 5.15 hours from 00:00 – 05:15.

Therefore, we would question whether the recovery period should count towards the ban period. We expect a full 6.5 hour period when only dispensed flights would be acceptable. We also consider that the statement in the Future Runways Operation consultation document which states at para 4.6.4 that “options which do not allow for scheduled flights between 05:30 and 06:00 will mean that we cannot provide 740,000 flights a year” somewhat misleading as this is dependent on the options tested for the timings of the ban. We note that the Airports Commission recommended a scheduled night flight ban from 23:30 – 06:00 given the evidence of the greater health impact of noise on sleep disturbance in the early morning, but from the documentation this timing does not appear to have been tested.

### **Noise envelope**

The ANPS states that 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 (with reference to the 2013 baseline for the 54dB LAeq,16h noise contour assessed by the Airports Commission where LAeq,16h indicates the annual average noise levels for the 16-hour period between 0700 – 2300). We consider that the design of any noise envelope must go beyond maintaining the 2013 baseline.

Some noise experts are of the view that the 2014 Survey of Noise Attitudes (SoNA) needs updating to test whether 54dB LAeq,16h is still the right level for determining the onset of significant annoyance and 51dB LAeq,16h appropriate for the Lowest Observed Adverse Effect Level (LOAEL), and we note that they are higher than recent WHO guidelines. Because of the noise impacts on health and the fact that this is an area that is still little understood, especially in relation to mental health, we expect HAL to undertake comprehensive sensitivity testing to assist the design of the noise envelope that looks at other metrics including the WHO guidelines and levels below 51dB LAeq,16h, frequency of overflight, Lmax and ‘single mode’ operations (to avoid disadvantaging communities who currently only get overflights on easterlies - 30% of a typical year - but this is not reflected in noise contours that average out over a year). Furthermore, it is important to demonstrate that the assumptions around improvements in aircraft technology and future fleet mix are robust or apply sensitivity testing. The noise envelope should be subject to regular review at least every 5 years.

We expect that only the quietest aircraft will operate during the night period and that Heathrow should progressively reduce the amount of quota available for the period outside of any no operations period.

### **Noise insulation policy**

We support the proposed changes to the noise insulation policy in line with ANPS para 5.245 and that it should also be subject to regular review.

### **Early growth and Independent Parallel Approaches (IPA)**

HAL indicated in Consultation One that they were looking to deliver early growth to provide up to an additional 25,000 ATMs a year on Heathrow’s two existing runways and that this could form part of the application for development consent. Early growth is dependent on the use of IPA. This is a serious concern for many residents of Surrey. It could potentially impact on areas of Surrey Heath, Woking, Spelthorne, Runnymede, Elmbridge, Epsom & Ewell, Mole Valley and Reigate & Banstead. Many residents that previously would have had respite when the wind changed direction will no longer benefit and will be subject to adverse noise impacts from departing and arriving aircraft overhead. The council does not support IPA as it would represent a worsening of the current situation for many local communities and could have health impacts.

HAL’s analysis, based on various assumptions, indicates that early growth would result in more people being newly exposed to noise levels above the 51dB LAeq16h daytime LOAEL than without early growth and that some of these will be Surrey residents. We do not consider there to be any national policy basis in either the ANPS or Government aviation policy for early growth (see our later comments on early growth). However, if early growth is to be allowed as part of the DCO, then it must be subject to binding conditions to manage noise including no additional runway landings or take offs before 06:00.

## **Construction**

As indicated above, currently, HAL's construction proposals are generally high level and are considered to be standard proposals expected to apply to any major construction project. Significant noise impacts on residents in the Stanwell Moor/Stanwell area of Spelthorne are indicated in some of the consultation material which will need to be mitigated and residents compensated for, but more information is needed.

### **Carbon emissions (Feedback question 12)**

The Committee on Climate Change (CCC) is expected to report in the autumn setting out its recommendations for the aviation sector consistent with delivering the Government's recently legislated target for net zero carbon by 2050. We expect these recommendations to be taken into account in the Government's final Aviation Strategy for 2050 and there may be a requirement for the ANPS to be reviewed. Therefore, this will be a key consideration in determining whether the DCO application is acceptable in terms of its impact on the ability of Government to meet its carbon reduction targets that HAL will need to address.

More details are needed on the design and construction of airport infrastructure in relation to reducing carbon emissions and a stronger commitment from HAL to public transport and active travel measures.

### **Biodiversity and ecological conservation (Feedback questions 12 and 22)**

The following comments on this topic can be summarised in four key points:

1. The need for more information on mitigation and compensation measures to enable us to understand the likely impacts and the area of land required.
2. The need for areas of mitigation and enhancement which are part of the Masterplan to be included in the proposed DCO boundary.
3. The need for greater detail on the assessment around bird strike risk, which is an important consistency issue for this council given the work we carry out with HAL in this area.
4. The need for further detail as to how habitat compensation land can be both managed and protected to ensure additional liabilities do not fall on local authorities.

In relation to the biodiversity and ecological conservation aspects of the expansion proposals, much of the detail remains to be worked up with some ecological surveys still ongoing and mitigation and compensation measures yet to be developed. We are also concerned that there will be insufficient time in the process to influence proposals for biodiversity and ecological conservation and that, without precise information as to the extent of impacts, the area of land required to ensure the mitigation and compensation is unclear. Proposals are light in relation to biodiversity net gain.

The PEIR (Non Technical Summary Section 4.2 Biodiversity), includes a table of biodiversity impacts considered to have significant negative effects. Following the mitigation hierarchy, as required by the ANPS para 5.94, where impacts cannot be avoided, they should then be mitigated and finally compensated. For this DCO, the emphasis is on the mitigation and compensation measures. These are critical for ensuring no net loss of biodiversity and creating net gains and any uncertainty on whether such measures can be delivered will mean the scheme is unable to comply with the ANPS requirements.

We are concerned that the preferred Masterplan includes areas of mitigation and enhancement outside the proposed DCO boundary. Great emphasis is made of the role of green infrastructure in mitigation and enhancement and the role of the Green Loop, but parts of this are also outside the DCO boundary. During consultation, HAL stated that such areas would be included within the DCO boundary and we consider that the DCO boundary needs to include these areas if there is to be certainty that the measures can be achieved. We also query whether the Green Loop is wide enough to function properly, specifically as a wildlife corridor, in Spelthorne.

The proposed modifications to watercourses, creation of flood storage and treatment areas and overall changes to the water environment adjacent to the airport may result in increased birdstrike risk. No assessment of risk appears to have been included. In particular the proposed water

treatment facility would on the face of it appear to conflict with birdstrike precautions on which Surrey County Council works very closely with HAL to ensure both safe skies and good quality environment on the ground. An explanation of why this facility is proposed in this location and the acceptance of it, would be welcomed.

Further detail is required as to how habitat compensation land can be both managed and protected to ensure additional liabilities do not fall on local authorities. There will also be a need to monitor impacts on habitats and species and the success of the mitigation and compensation measures and this needs to be clarified.

### **Land use including open space, green infrastructure and Green Belt (Feedback questions 12 and 22)**

The following comments on this topic can be summarised in four key points:

1. The need for more information to demonstrate how new green infrastructure outside the proposed DCO boundary will be delivered.
2. The need for more detail on how the loss of open space resulting from expansion within Spelthorne will be mitigated.
3. The need for any implications on the ability of Hithermoor Quarry to be used for the processing of minerals from King George VI Reservoir to be appropriately assessed.
4. A number of mineral restoration schemes are due for completion during the proposed construction period. Much of the biodiversity and recreational mitigation being offered is already being provided through restoration and we need to see details of the mitigation being provided over and above the approved restoration scheme.

### **General**

This council is very concerned that not all land to be assembled for necessary mitigations is included within the red line DCO boundary and questions how it will be secured if not included. We also have concerns about the loss of public access to Hithermoor and HAL need to clearly demonstrate that adequate mitigation will be proposed for this loss. HAL need to provide much greater detail on the enhancements that are proposed to mitigate the loss of open space generally within Spelthorne.

### **Mineral sites and restoration plans for green infrastructure**

Surrey County Council strongly disagrees with proposals set out within the PEIR to disregard aggregate recycling capacity at Hithermoor Quarry. Although Hithermoor Quarry has a time dependent permission, the site is identified in the adopted Surrey Minerals Plan as the preferred location for processing of material from the King George VI Reservoir allocated mineral site and the council has entered pre-application discussions with the operator of the site regarding use of this land for processing of material from the reservoir, as well as an extension to their current aggregate recycling activities. It is possible the extension of aggregates recycling activities could be sought for a period of 15 years. The council considers that the impact of including this land within the DCO project has the potential to be significant and should not be ignored, especially given the context of the adopted Surrey Minerals Plan. We consider that any implications for the ability of this site to be used for the processing of material from King George VI Reservoir must be appropriately assessed.

We consider that there is a need for HAL to discuss with this council any proposed alterations to agreed restoration schemes, including at Hithermoor, Stanwell Quarry, Homers Farm and Hengrove Farm and what compensatory provision is to be provided. We welcome confirmation that the restoration status of sites will be the baseline and discussions are now urgently needed to agree the enhancements and benefits to be delivered over and above what the restoration scheme would achieve. Mitigation and compensatory provision must be local to the site impacted. Part of the Hithermoor site has been subject to longstanding restoration and woodland planting and there would need to be additional environmental compensation for losses (taking into account woodland has amassed years of growth).

We support Heathrow's intention for mineral to be won from the relevant sites in advance of Heathrow related development. The PEIR acknowledges that the operator has begun extracting sand and gravel from the Homers Farm, Bedfont site. The PEIR considers that mineral will have

been fully won from the site prior to development. We would urge HAL to engage now regarding any alteration to the current restoration scheme in place for the site, for example regarding backfilling of voidspace.

We refer you to the approved restoration plans for the sites referenced below (which we can supply if needed):

- **Zone H - Homers Farm Quarry** is affected here. This is a current operational site that is due to be back filled and restored to agriculture, with restoration due for completion by September 2020. The site is now proposed in the preferred Masterplan to fulfil drainage and pollution control infrastructure provision. Whilst this proposal recognises the constraints of the Southampton to Heathrow Esso pipeline, there also exists a Thames Water high pressure main that has pressure plug features which are dependent upon the weight of material over the pipeline to maintain that pressure. There is no detail of what exactly the drainage and pollution control proposals actually involve and there could also be a birdstrike issue to consider.
- **Zone J - Stanwell Quarry** is affected here. This is consented to 2027 (principally the recycling plant), but there is a phased restoration with much of the quarry already restored or expected to be in advance of that date. The council welcomes the fact that the scheme does now include most of the footprint of the Stanwell Place historic garden. However, the most recent time extension permission did include the north west part of the site changing from agriculture to create a new extension to the historic gardens and amenity area as a key component of the restoration design of the site. If this area is now to be lost through the DCO scheme it will need to be mitigated.

The proposed diversion of the Duke of Northumberland and Bedfont Rivers together with greenspace alongside is also welcomed. Given the green space provision to the north and the Green Loop proposal that appears to affect the southern end of the site, it would seem logical to include this area to link greenspace provision within the Masterplan. The historic garden has water features that were originally fed from the Northumberland and Bedfont Rivers and the opportunity should be taken to connect these to provide a circuit of water supply to the gardens.

The scheme does wipe out some of the biodiversity and open space enhancements being delivered through the restoration of the site and we would wish to see that this is expressly mitigated and compensated for. On the face of it, the new greenspace along the realigned rivers would do this, but it is not clear whether this is compensation for the loss on the site or from elsewhere in the scheme. Figure 7.5.1 in the Preferred Masterplan document shows an attenuation basin on the site which is not shown on the zonal plan, whilst figure 7.10.2 shows a noise attenuation bund proposal over the historic garden, which again is not shown on the zonal plan.

- **Zone K - Hithermoor Quarry** is affected here. The majority of the site (excluding the recycling/processing hub) is already close to restoration. Much of what is being offered as greenspace and biodiversity enhancement is already being delivered through the site's restoration. It should be made clear in the proposal, what *additional* provision the Heathrow scheme is making to this. The public open space for wildlife and people to the north west of King George VI Reservoir conflicts directly with the proposals for working the reservoir for mineral, being the area identified by the company for silt disposal. This could be an appropriate proposal for the use of the site, however, once extraction has ceased. The large drainage and pollution control facility being proposed on the site would wipe out the Tom Rod SSSI quality grassland site (which would need to be compensated) and raises the significant issue of birdstrike.
- **Zone U - Hengrove Farm Quarry** is a new affected area. Again, the expansion proposals ignore the fact that the restoration proposal for the site, which will be completed in advance of expansion, would deliver much of the scheme. Restoration is due for completion by the end of 2020. As elsewhere, this proposal could be integrated with the wider area to create a big open space/habitat area with Shortwood Common to the west and Hengrove Park to the east.

## **Resource and waste management** (Feedback question 12)

The following comments on this topic can be summarised in three key points:

1. There are insufficient measures in place to mitigate the identified potential significant adverse impacts of the DCO project.
2. The need for more information in relation to construction and waste management and for more detailed evidence to support the assumptions regarding the amount of waste arisings to be diverted from landfill, especially with regard to hazardous waste.
3. The need for more information on the implications for C,D &E waste and the specific implications arising from the early closure of Stanwell Quarry.

We are concerned that the waste chapter of the PEIR states that there will be a significant adverse impact on landfill capacity during phase 1 of construction, including for hazardous waste and also that the project will result in a significant adverse impact on non-hazardous waste capacity during the operational phase if the Lakeside energy from waste facility is not relocated. At para 20.8.15, the PEIR states that local authorities will account for the loss of capacity at hazardous and non-hazardous landfill sites and waste treatment facilities resulting from the expansion project through allotting more capacity in their Waste Local Plan updates. Para 20.13.1 states that there will be no additional measures or compensation for the likely significant effects of the DCO project. We are concerned that at present there are insufficient measures in place to mitigate the identified potential significant adverse impacts of the DCO project.

Assumptions have been made regarding the amount of waste material to be diverted from landfill via reduction, reuse and recycling which are based on best practice. Assessment of impact is based on these assumptions being realised. We are concerned that there is insufficient detail in the evidence provided to demonstrate that this will be the case, especially with regard to hazardous waste. Advance sight of the commitments and proposals to be included within the DCO and Environmental Statement is needed. Further detail is also required regarding how waste will be transported to management facilities.

The PEIR states it is only possible to provide an assessment for CD&E waste in broad terms due to lack of detailed design and phasing of works and we are concerned that as this work has not yet been carried out the assessment of potential adverse impacts is inadequate. We would also query how prevention activities have been calculated, it is stated that it is based on 'modest' assumptions, but further detail is requested.

We consider that insufficient evidence has been provided to indicate that the early loss of Stanwell Quarry as a waste facility would be neutralised by provision of additional CD&E waste management as part of the expansion project and it should be noted that the planning permission for the facility does not limit waste to originate only from Heathrow. There is also a need for more CD&E waste recycling capacity in Surrey and the premature closure of Stanwell Quarry would make this need more acute. The implications need to be appropriately assessed.

The draft Code of Construction Practice states that Site Waste Management Plans are to be produced in line with the Resource Management Plan. Site Waste Management Plans will include the permitted arrangements for onsite and offsite waste treatment, waste transfer and waste disposal. The council supports this, but is concerned that further work needs to be undertaken to understand how it will all work in practice.

We ask for a firm commitment that rail waste transport is favoured over road transport where reasonably practicable.

## **Flood risk** (Feedback question 12)

The following comments on this topic can be summarised in three key points:

1. The need for more information if this council as Lead Local Flood Authority is to accept that the expansion proposals will have little significant impact on flood risk in Surrey.
2. Assessments of risk which use assumptions of future mitigation measures (as yet undeveloped) should apply the precautionary principle and conservative approach rather than assuming that these measures will result in no significant impact.

3. All infrastructure including water storage/treatment areas which is necessary for the operation of the airfield should be included within the overall DCO boundary.

Much of the work required to fully assess impacts is yet to be undertaken and the assessments to date are based on assumptions that future work will provide suitable adequate mitigation. This may be the case, but a precautionary approach should be used at this stage and a worst case scenario assumed when assessing risk related to the water environment and flood risk.

Whilst we appreciate that the PEIR is taken at a snapshot in time and not all relevant information will be available to make assessments, a large amount of the baseline assessments are made using historic desktop study information rather than qualitative data on the existing situation. Instead, a general assumption has been made that all flood risk impacts will be resolved using mitigation measures which will not affect location or scale of development. This is not our experience based on other development. Flood risk mitigation requires detailed assessment and mitigation measures frequently require significant land use in specific locations to achieve sustainable drainage using gravity rather than pumped systems. It is difficult for this council as Lead Local Flood Authority to agree with the conclusions that there will be little significant impact on flood risk especially as there is little detail on the final proposals or mitigation measures proposed.

No details of the flood storage area capacities, attenuation area sizes and final locations, discharge locations, and final watercourse flow regimes have been provided. Again, this makes it impossible for the authority to conclusively agree with the outcomes of no significant effect presented in the PEIR for flood risk or drainage implications. The hydraulic modelling is not yet complete and therefore it is not possible to satisfactorily say what the level of residual risk will be or what mitigation may be required, or if the sequential or exemption tests are likely to be met. To provide any meaningful comment, we need much greater detail, including Flood Risk Assessments, GIS shapefiles of alignments, mitigations and likely structures and barriers. All of the options will need a full analysis to determine the preferred option with lowest risk, best environmental gain and overall balance versus cost/disruption and mitigated impact.

The Drainage Impact Assessment is a qualitative assessment rather than the quantitative one required to demonstrate that the site will be drained adequately and meet the requirements of not increasing flood risk on site or elsewhere. No opportunities for reducing flood risk have been incorporated into the proposal or even evaluated to show whether they are feasible; this goes against NPPF paragraph 157 (c).

The approach to surface water drainage being undertaken is for bookending of drainage outflows: the lower end is the greenfield rate as set out by Defra National Surface Water Drainage Standards (and represents the key requirements which need to be met by the DCO proposal), the upper end is no increase in runoff. However as infiltration is unlikely to be an option across the whole site (due to high groundwater levels, contaminated ground or clay strata), attenuation space is required to restrict flows to either of the two bookends above. The amount of land allocated to each parcel for attenuation space is therefore vital in determining whether a site will discharge drainage at the upper or lower bookends (i.e. if not enough attenuation space is allocated then only the upper bookend becomes technically feasible).

For the drainage of the runway, terminals and main airside activities it appears space has been allocated solely to meet the upper bookend – this means there will be no reduction in flood risk. This is likely because of the large flows (and therefore attenuation space) involved and therefore may be justifiable. Currently, no qualitative evidence has been provided in terms of the flows themselves or the land take allocated to storage. No attenuation information has been provided for other scheme components, including the Southern Parkway, but the space allocation for these must be provided and the amount allowed for will dictate which of the upper or lower bookend of discharge rates is met and whether there will be opportunities for any sites coming forward to meet the Defra standards that discharge ‘must be as close as reasonably practicable to the greenfield runoff rate from the development’.

As Lead Local Flood Authority, Surrey County Council consent any changes to non-main rivers within the county, therefore detailed discussion around proposals will be required. The consents need to ensure that the requirements of the Water Framework Directive are met.

## **Water quality and resources (Feedback question 12)**

The following comments on this topic can be summarised in four key points:

1. The need for more information on mitigation measures to enable an informed view of the likely effects to be developed including as to how any risk of downstream pollution from surface water attenuation features will be avoided.
2. The need for more information on measures to mitigate the hydromorphological impacts of the proposed river diversions.

The Water Framework Directive (WFD) assessment has assumed that the water quality and water quantity impacts are able to be mitigated through unidentified future works. This does not accord with the precautionary principle. This also applies to the assessment of the Covered River Channel which is an untried and untested approach and we believe that as such it is not appropriate to assume that “on the balance of available evidence at this stage, it is considered possible that the current concept design could satisfy the criteria.”

Currently, as impacts are likely to occur for which adequate mitigation has not been proposed or identified it is likely that the conditions set out under Article 4.7 of the WFD will have to be met to show that the development is not in breach of the WFD. This is not addressed in the PEIR and again has been delayed to a later stage.

There is an assumption that land which has previously been contaminated or used as landfill could be used as flood storage/water treatment areas; this is yet to be agreed with the Environment Agency and represents a significant risk.

Further detail is required as to how any risk of downstream pollution from surface water attenuation features will be avoided.

## **Geomorphology and river modification**

The expansion obviously results in huge disruption to the geomorphology of the hydrological system. Whilst lots of these historic channels are manmade they have become naturalised over time and hence the impact caused by diverting, combining and eventually separating using flow structures is potentially substantial. Indeed, the PEIR rightly identifies that there is a risk of high impact to hydromorphology as a result of these diversions. However, as the list of additional environmental measures required to mitigate them has not yet been finalised nor the feasibility of any measures tested, we do not believe that the PEIR has adequately demonstrated that the risk of these impacts can be mitigated and that it cannot be deduced there will be no significant effect on these watercourses as a result of the construction activities.

## **Historic environment (Feedback questions 12 and 18)**

The following comments on this topic can be summarised in two key points:

1. The need for more information especially in relation to evaluation to accord with the nationally-accepted processes of assessment-evaluation-mitigation set out within the NPPF.
2. The need for site specific impact information and archaeological impact appraisals for affected areas within the county.

The PEIR information provided is a mixture of the comprehensive and the generic. It is comprehensive in its identification of the issues and the spread of information accessed and referenced, but it falls short of the depth of information expected in a sitespecific Heritage Statement or archaeological Desk-Based Assessment and deals with many of the issues in a generic, conceptual manner, citing future, and as yet,unavailable reports. Still to be provided is site specific development and ground impact information as well as the terms of the archaeological investigation and historic building recording that are to come.

It is not entirely satisfactory that this PEIR stage of reporting is all that will be available prior to mitigation works being developed. We suggest that despite the wide ranging nature of the information presented, the approach falls short of the nationally accepted processes of assessment-

evaluation-mitigation set out within the NPPF. Any attempt to bypass the evaluation stage is unacceptable and would require detailed justification.

Proposals within Surrey appear to offer possible scope for preservation *in-situ* through re-siting or careful foundation design should archaeological remains be present. We would highlight that the Southern Parkway is proposed partially within a county-designated Area of High Archaeological Potential. The Archaeological Survival Model presented within the documentation does not have the correct Surrey Areas of High Archaeological Potential depicted and should be updated. Unknowns remain and for all impacted sites we will need to understand the direct nature of the impacts proposed, whether or not further assessment and/or evaluation of the site(s) will be required for archaeological purposes to determine if remains are present and whether or not preservation *in-situ* is desirable or indeed, achievable. Surrey County Council will be seeking site-specific impact information and archaeological impact appraisals for affected areas within the county.

HAL should be mindful that some of the Green Loop and other mitigation proposals might themselves impact on archaeology and heritage, and therefore ensure this has been taken into account through impact appraisal. This should include details of the possible hydrological impacts on any buried archaeology through proposed river diversions. This might require the implementation of a medium to long term monitoring programme, and the development of a contingency excavation resource should previously stable sites be found to be dewatering.

In line with the advice being given by Historic England and practices set out in the national planning legislation and guidance, we will require pre-determination archaeological evaluation of threatened sites, unless a different approach can be demonstrated as providing either a superior return on archaeological data, or there is the opportunity to divert significant resources into alternative heritage benefits for the county with little or no loss of archaeological information retrieval.

It is encouraging to note that heritage concerns are being integrated into the landscape and community considerations.

#### **Dust, odour, artificial light, smoke and steam (Feedback question 12)**

There is a need for much more information on construction. We have concerns that much of the detail on working hours for individual sites will be included in the Code of Construction Practice to be submitted with the DCO. Discussion around such key issues needs to take place in advance of DCO submission. The potential for temporary relocation of residents in Stanwell and Stanwell Moor will be linked to details such as whether 24/7 working is in operation and this information must be made available at the earliest possible stage.

We wish to highlight that the baseline for lighting impact at the Southern Parkway should be the restoration scheme, not the current mineral workings.

#### **Community compensation (Feedback questions 20 and 21)**

The following comments on this topic can be summarised in three key points:

1. The Community Fund must not be used to deliver mitigation required to make the proposals acceptable in planning terms, but should compensate those impacted by expansion.
2. The need for a clear governance structure to be in place for the Community Fund with a body having oversight of the overall Fund and its long term planning, the allocation of spend, and monitoring and reviewing individual projects.
3. The WPOZ should be extended to include Stanwell Moor and large parts of Stanwell and a local health impact assessment undertaken for each of these communities.

We would like to stress that the proposed Community Fund must not be used to deliver mitigation required to make the proposals acceptable in planning terms. For this reason, we oppose the use of the community compensation scheme to fund the Unforeseen Local Impacts Mitigation Strategy (ULIMs) as set out within the Environmentally Managed Growth proposals. The distinction between compensation and mitigation must be maintained. The approach to ULIMs will reduce the amount of

funding for wider community schemes and potentially absolves HAL of the need to deliver mitigation required in planning terms. This is in addition to significant practical issues around the ULIM proposals, including the proposed annual funding approval process and the need for mitigation schemes to compete against each other for funding. If schemes are required to mitigate impacts, they are all essential.

It remains difficult to comment on the geographical area that the fund should cover without detailed information of the noise impact of an expanded Heathrow. There is a clear role for the fund during construction, so work must be carried out early on to ensure the fund is up and running immediately post DCO determination.

A clear governance structure needs to be in place for the Community Fund with a body having oversight of the overall Fund and its long term planning, the allocation of spend, and monitoring and reviewing individual projects. Careful consideration needs to be given as to how community involvement in the Community Fund is guaranteed. There must be local authority political representation on the assessment panel. HAL may benefit from having discussions with Community Infrastructure Levy collecting authorities who will have useful learning from administering the spend of CIL receipts.

We again highlight that there must be additional compensation specifically for the residents of Stanwell Moor and large parts of Stanwell, who will experience prolonged quality of life and potential health impacts given the long construction period and the increase in airport operations. Assessments in the documentation point to the fact that residents in these areas will be exposed to temporary unacceptable levels of noise during construction, especially construction of the Southern Parkway, a major new roundabout junction at Stanwell Moor and realignment of the A3113. They will also be newly exposed to more aircraft noise from planes on the runways and taxiways as well as overhead once the expanded airport is operational and the number of ATMs increases. Air quality can also be expected to be poorer as a consequence of these activities. There are references to the need for temporary re-housing in the consultation document that focusses on the specific impacts on Stanwell and Stanwell Moor, but with no further detail on eligibility for compensation, which we do not consider to be acceptable. In our view, the WPOZ should be extended to include Stanwell Moor and large parts of Stanwell. We consider that there needs to be a local health impact assessment for each of these communities so that the combined and cumulative effects of HAL's proposals on residents can be fully understood.

### **Skills (Feedback question 17)**

The following comments on this topic can be summarised in the following key point:

1. The need for more engagement and collaboration to deliver apprenticeships and skills training, engaging with SMEs and attracting inward investment to Surrey.

Surrey County Council would value the opportunity to comment in more detail on the draft Apprenticeship Plan, detailing how HAL will achieve its targets, before it is published in the Economic Development Strategy by the end of 2019. For example, we value HAL's focus on enabling more vulnerable people to access sustainable and rewarding employment and would recommend that the Apprenticeship Plan defines what percentage of the 10,000 apprenticeships will be allocated to train and support vulnerable young people and adults in pre-apprenticeship schemes and directly in apprenticeships. Also, how will HAL continue to support these individuals into sustainable employment either as part of its own workforce or with local employers?

We recommend opening up a dialogue with other parties about skills including Surrey's education sector (not just those within the Heathrow core study area) and with the wider construction/infrastructure sector such as the Strategic Skills Forum for Construction to:

- identify opportunities to expand and grow leading-edge education and training provision for construction at all levels/programmes, within Surrey institutions and providers (beyond the current skills partnership group) and in collaboration, for example with existing programmes such as <https://www.surrey-ia.org/>;

- to universally make the construction sector a highly attractive career proposition for young people and adults, including those from diverse backgrounds, and providing clear pathways to career progression; and to
- understand the impact of population growth (both transient and permanent workers) on the county of Surrey (not just the core study area) and its resources.

This needs to be done in collaboration and within the context of the wider needs of other major future infrastructure/built environment projects in the South East.

We support HAL's commitment to the early adoption of T-levels starting in 2020. However, it is unclear if the proposed 1,200 work placement days for T-levels is for the academic period 2020-2022 only. If so, this equates to approximately 20 pupils (completing a 45 – 60 hours workplace), during their two year course. What is the expected yearly level of work placements beyond 2020?

We welcome that the skills transfer passport will be jointly co-designed with other sector employers to meet the needs and requirements of future UK infrastructure and construction projects. The data collected could also help to proactively identify future skills gaps and enable strategic planning of education provision. In addition, to the 'world of work' we would encourage HAL to create programmes to inspire, attract and support adults seeking a career change.

We support HAL's current approach to engaging with SMEs and the plans to expand the programmes and would encourage HAL to work with Surrey County Council, Surrey Chamber of Commerce, Surrey districts and boroughs and the LEPs to ensure that engagement is made with SMEs across Surrey.

HAL states it will continue to work with partners to help secure inward investment through a range of initiatives such as sectoral initiatives, marketing initiatives, town centre improvements and place making. We would support this objective and would like HAL to provide more details on how this will be done. HAL needs to continue to work with Surrey County Council, Surrey districts and boroughs and the Enterprise M3 Local Enterprise Partnership to ensure that any additional inward investment activity is coordinated with what is already being carried out.

As specified within the ANPS, the employment and skills measures proposed by HAL need to be tracked through a monitoring framework and this must have a clear baseline position.

We stress the importance of surface access improvements for access to skills and job opportunities and are slightly concerned that the surface access modelling for the scheme assumes a rapid focussing in the distribution of colleagues' home locations to the east of the airport, which does prompt questions around the economic benefit of expansion for the south west corner in terms of direct job creation.

### **Assessment principles** (Feedback questions 12 and 14)

The following comments on this topic can be summarised in three key points:

1. A need for further engagement with Surrey's Local Resilience Forum.
2. The need for clearer articulation of how health effects are assessed, in particular why moderate effects are all deemed not significant.
3. The need for the detailed methodology for predictive modelling of health effects to be provided.
4. The need for a separate local health impact assessment undertaken for the communities of Stanwell and Stanwell Moor.

### Security and safety considerations

In Surrey, the Lower Thames Catchment is the main area of risk for flooding in the county and since 2008 we have had three significant flood incidents in that area, the most impactful in 2014. On this basis, the national risk is reflected locally and the assessed risk for Surrey of fluvial flooding is very high particularly in this area of the county. If the construction phase for the Heathrow expansion is to run to post 2030 it is likely that there will be a significant flood event in the Lower Thames area and this needs to be taken into consideration.

Clarity is required as to who will be preparing the emergency response plans and how they will link to local off airport arrangements. There also needs to be greater clarity on whether incidents in the area are an airport lead response (under Emergency Orders CAP 168 chapter 8) or for the local response plans for the Local Resilience Forum (LRF) partners. Further engagement is needed with Surrey's LRF.

## **Health**

We welcome the fact that the PEIR makes use of the WHO definition of health and the wider determinants of health model. Within the PEIR it is not clear how professional judgement is used to determine whether factors are major/moderate/minor effects and also whether these effects are then significant. All moderate effects have been deemed not significant and the narrative to support why this decision has been made is not clear. There needs to be a narrative to link the methodology set out in Chapter 5 – which clearly shows the elements that will be considered in the assessment, with the final decisions of significance, as the thread is not clearly articulated in the PEIR. Moderate effects are potentially significant – for example, school displacement is only deemed significant for vulnerable groups, but impact on education of disruption could be across the population. Therefore, the professional judgement on significance of effects needs to be transparent and clearly articulated.

In relation to active travel, Spelthorne Borough Council is the most deprived community within the study area. The PEIR clearly sets out the link between lower incomes and reliance on active travel and that Stanwell and Stanwell Moor are community areas where active travel routes will be affected by the DCO. The PEIR also confirms that the strength of evidence is strong for a direct causal relationship between use of active travel and health outcomes and both national and local policy supports active travel. However, for vulnerable groups the impact is assessed as moderate negative (not significant) to minor negative (not significant) and it is not clear how assessors have determined the effect to be not significant. It is unclear whether a factor deemed to be not significant, would result in no mitigating measures being put in place to prevent potential negative impacts on health.

In relation to formal open space, it is specified that local re-provision of formal open space will be 'suitable' to the remaining population's needs. We request further information as to how 'suitable' provision will be determined and the evidence that will be used to support this.

We note that many of the key environmental measures were not in place before the PEIR was undertaken but should be available to inform the Environmental Statement. Therefore, the PEIR was not able to assess how these policies and strategies might mitigate impact. This makes it difficult to make an accurate assessment of the impact of these factors. It is not clear in the PEIR how the unintended health consequences will be minimised and how the beneficial health impacts maximised. It is important that the PEIR findings influence and feed into development of the key environmental measures (both embedded and additional measures) to ensure they maximise the opportunities to mitigate negative health impacts as well as maximise any potential positive impacts.

Inconsistencies have been noted in the reporting of some of the baseline data. In some cases the data for a specific indicator has been reported at borough level and county/sub-borough level for others. For example, in section 12.10.146 the prevalence of obesity or being overweight and inactive adults are reported for Spelthorne at borough level, however the data for residents' use of outdoor space has been reported at Surrey county level. We acknowledge that this could have been because the data for this indicator was not available/published at borough level, however in such cases it should be stated clearly and acknowledged that county level data may not always be representative of the borough/ward level population characteristics. We also note that some of the strategies referenced for Surrey are out of date (see <https://www.healthysurrey.org.uk/about/strategy>). The methodology describing the future health baseline assessment in chapter 5 of the PEIR is also unclear.

There is inadequate use of referencing to the sources of scientific literature and data sources within the report. This is important to enable cross checking of the evidence and also assess the type of evidence used (based on its strength and quality).

The cumulative and combined effects on the health of specific populations needs to be clearly assessed. We would like to see a separate local health impact assessment undertaken for

communities most affected around the airport at both construction and operation stages. Within Surrey this should include Stanwell and Stanwell Moor.

We would also refer you HSPG's draft position paper on public health principles especially in relation to producing a health management plan and construction ([http://www.heathrowstrategicplanninggroup.com/application/files/3915/6101/6919/HSPG\\_Position\\_Paper - May 2019.pdf](http://www.heathrowstrategicplanninggroup.com/application/files/3915/6101/6919/HSPG_Position_Paper - May 2019.pdf)).

### **Environmentally Managed Growth (Feedback question 12)**

HAL's proposals for Environmentally Managed Growth (EMG) highlight that the operational aspects of the expanded airport will have significant impacts for local communities and the ANPS is clear that expansion should only be allowed if these impacts can be managed within acceptable limits and every effort made to reduce, mitigate and compensate for the impacts. We agree the need for effective and robust monitoring and enforcement of environmental limits and/or envelopes, but we have significant concerns as to how the proposed framework will operate and how effective it will be. Much more information is needed on the proposed approach. Our concerns relate to:

- Any environmental framework to manage growth should not just be limited to the ANPS surface access targets, air quality, noise and carbon but should also monitor targets in relation to biodiversity and ecology to ensure that mitigation measures are delivered and are effective.
- The proposed Independent Scrutiny Panel (ISP) should have statutory powers to ensure limits are met. In the case of non-compliance with limits, the ISP has the potential to agree and propose mitigation, but it is unclear as to what powers it would have to bind Heathrow to take corrective action and implement mitigation, especially where impacts are off-site, or to prevent the airport's growth beyond a certain point until further mitigation can be found.
- Monitoring will be reviewing information to report against the limits 'after the fact' so it won't always be known if limits have been exceeded until some time after they have been breached. Therefore, it will be difficult to ensure that limits are adhered to and if the limits are shown to have been exceeded how the ISP will have the power to reduce the scale of airport operations.
- The community fund should not be used to mitigate for impacts which are as a direct result of expansion, either foreseen or unforeseen. The community fund should be used to improve the quality of life for local residents impacted by the expansion, above and beyond the mitigations required. There should be review mechanisms in the DCO to deal with mitigation for unforeseen impacts.

Additionally, we consider that it will not be possible to know whether the EMG approach can work in an acceptable way to ensure that environmental targets are on track before further growth is allowed until it has been operating for a number of years. The existing planning regime at the airport sets a cap on ATMs to control aircraft numbers and limit environmental impacts. In our view, the DCO should set interim/conditional caps on the total of ATMs allowed, potentially aligned with the ANPS surface access requirements, to provide more confidence and security for local communities.

The structure and governance for EMG needs to ensure accountability to local communities and there needs to be further engagement with this council and HSPG to develop this aspect.

As specified within the ANPS, the employment and skills measures proposed by HAL also need to be tracked through a monitoring framework.

### **Early Growth (Feedback question 8)**

We do not consider there to be any national policy basis in either the ANPS or current government aviation policy for making more intensive use of Heathrow's existing two runways and increasing ATMs by 25,000 per annum.

Government policy in the ANPS only has effect in relation to the provision of a Northwest Runway at Heathrow and for new terminal capacity, although it would be a relevant consideration in determining

other applications for airport development particularly in London and the South East. In light of the Airports Commission recommendations on the more intensive use of existing infrastructure, government considered the needs case for making best use of existing runways across the whole of the UK and this is set out in its June 2018 policy statement. This is clear that government considers there is a needs case for making the best use of existing runways but beyond Heathrow. Para 1.25 states:

'As a result of the consultation and further analysis to ensure future carbon emissions can be managed, government believes there is a case for airports making best use of their existing runways across the whole of the UK. The position is different for Heathrow Airport where the government's policy on increasing capacity is set out in the proposed Airports NPS.'

Therefore, HAL should clearly demonstrate why these early growth proposals in the form of more intensive use of the current runways are needed to increase airport capacity in the UK and in the South East. There needs to be further engagement with local authorities on the detail of mitigation proposals.

### **Masterplan and Development Consent Order (Feedback questions 1 and 22)**

As a general principle, all mitigation proposed in the Masterplan should be included in the DCO red line boundary.

We need further assurance on how the green and blue infrastructure elements of the Masterplan will be delivered given that much of the area identified for this purpose lies outside the DCO boundary. Separate third party agreements for each land parcel outside the DCO are currently proposed, but there is no guarantee that this land can be secured to deliver the Masterplan being promoted. The realisation of the Masterplan is crucial to ensuring the airport provides the benefits promised to local communities and a clear mechanism to guarantee delivery of the Masterplan needs to be provided.

In common with the other HSPG authorities, we feel that there has been a lack of consideration of B2 and B8 land uses displaced through the scheme. Logistics space will continue to be a key issue given the shortage of land available to accommodate what is needed in the Heathrow area and more consideration will have to be given to this issue if Heathrow is to achieve its economic potential. The dispersal of freight and cargo into a wider area will also create additional transport impacts outside the airport boundary. The potential to include more of these displaced uses within the Masterplan should be considered further.

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