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14th December 2018

Ian Frost
Heathrow Airport Ltd

By email only

Dear Ian,

HSPG response to HAL's Preferred Components Masterplan, and HSPG Heathrow Area Landscape Framework

Please see attached HSPG's response to HAL's Preferred Components Masterplan to meet your deadline of 14th December 2018. I believe that many HSPG members will be submitting individual responses also.

Please also see attached HSPG's response to the November 2018 'preferred components masterplan' with regard to green and blue infrastructure considerations, building on the principles in HSPG's Heathrow Area Landscape Framework (HALF). The Landscape Framework has previously been submitted to HAL following agreement by HSPG in September this year and this version incorporates minor updates. This second stage considers the Preferred Components Masterplan presented to HSPG on the 7th November, and additional information provided since then (eg HAL's Green Infrastructure proposals map), and sets out the key concerns, requirements and some ideas on the solutions HSPG is expecting from HAL's Green and Blue Infrastructure proposals as part of the wider DCO scheme, and where there remain areas of concern that need to be addressed or more work required.

Overarching documents that frame the response and the HALF, are the HSPG Vision and Principles document (2016, prepared together with HAL), and the Outcomes Statement (2017) forming part of the HSPG Accord. More recently as you are aware, HSPG have submitted iterations of Masterplan Principles on HAL's emerging Masterplan options, the Landscape Framework and topic-based Position Papers which outline the Group's key asks for the preferred masterplan.

This Preferred Components Masterplan response is mostly based on the material presented at HAL's presentation on 7th November 2018 (noting that the Masterplan is not complete as yet, HAL have not reached a preference on the configuration of and access to the proposed parkways, and the position of the terminal buildings and associated facilities), and some additional information that has come to light since then through various meetings and workshops. It is not an exhaustive response, and HAL will note that there remain many key areas where there is still a lack of information and understanding for HSPG to provide a considered, comprehensive and detailed response.

Please note that for Bucks County Council, the response has been agreed at officer level only, and the Council will formally consider and approve the response at HSPG Leaders Board on January 17th. Given the tight timeframe between presentation of the Masterplan and deadline for responses, full engagement with Leaders and senior management amongst HSPG members has been difficult. As such, on the back of Bucks CC's position, there will be further discussion on the response by Leaders on 17th January and as such further comments may be submitted.

The attached response is comprehensive but you will note an on-going theme in it and following on from the point made above regarding key areas where there is still a lack of information, particularly within transport and environment fields. HSPG is concerned that, given HAL's schedule for statutory consultation on the Masterplan/DCO in June 2019, time is running out for members to receive, consider and fully feedback on outstanding information. There are still remain 'mixed messages' in certain areas too, for example on the subject of provision of construction worker accommodation on or adjacent to site.

HSPG importantly needs to be in a position where it can consider and input into all aspects of the expansion scheme at each phase (Masterplan and all other elements such as Surface Access Strategy, Green and Blue Infrastructure proposals, specific land uses, environmental impacts such as air quality and noise, impacts of construction) comprehensively and strategically, in order to shape the scheme in a beneficial way for consultation. In order to do this, HAL needs to engage with HSPG with a comprehensive package at least 3 months before consultation.

In addition, as has been discussed between the Group and HAL, further detailed technical sessions are required, and HSPG's suggestion is that, rather than the topic based 'deep dive' sessions held by HAL last September during development of the Assembly options, 'geographic' sessions are arranged focussing on key areas and addressing a range of inter-related technical matters. The programming of these sessions can be discussed at the HSPG/HAL Programme meeting on the 10th January 2019, and also how the expansion scheme 'package' can come forward to HSPG well in advance of statutory consultation.

Yours sincerely,



Alan Hesketh
HSPG Manager

HSPG Preferred Components Masterplan Response – 14th December 2018.

These comments are all made within the terms of the HSPG / HAL collaborative working and Service Level Agreement, respecting commercial confidentiality and limiting opportunity for detailed analysis and discussion within the HSPG organisations or more widely. The comments are made on a strictly ‘without prejudice basis’ to any position the HSPG and individual member organisations may take in future, and the organisations reserve the right to withdraw or change any comment made here without prejudice to their position.

HSPG have previously prepared the Masterplan Principles and Position Papers which outline the Group’s key asks for the preferred masterplan and have previously made responses to various emerging Masterplan options. This response is mostly based on the material presented at HAL’s presentation of the preferred components of the masterplan on 7th November 2018, and some additional information that has come to light since then through various meetings/workshops. It is not an exhaustive response, and HAL will note that there remain many key areas where there is still a lack of information and understanding for HSPG to provide a considered, comprehensive and detailed response.

The response is provided in a numbered and tabulated form for ease of reference.

No.	Subject Area
1	Key Fixes
1.1	<i>Southern Road Tunnel</i>
	<p>HSPG reiterate the support for the Southern Road Tunnel and welcome the introduction of this into the component masterplan presented. Whilst we generally welcome a southern access to the CTA, HSPG reserves its position until confirmation is provided that the access will be for public transport use and operational purposes only (and emergency use), and more detail is provided on how the tunnel will link and impact the local road network and what type of users will be allowed to use the tunnel. Our members do not support this the use of this tunnel for general vehicular traffic – access should be limited. to airport operations, public transport and cycle access only. Usage by other vehicles including private hire vehicles (PHV) and taxis would require clear justification. We require urgent clarification on this point.</p>
1.2	<i>Starter Extension Rejected</i>
	<p>The decision to not proceed with the ‘starter extensions’ options is welcomed by the HSPG as this accords with our previously stated preference.</p>

1.3	<i>Two Parkways</i>
	<p>HSPG continues to believe that consolidating the parking into two parkways which are well connected to the terminals via a fast and frequent mass transit system(s) is the best solution to parking provision. HSPG have several concerns with the parking provision proposed in the emerging masterplan. These include;</p> <ul style="list-style-type: none"> • Whether the total quantum of parking provision of 69,000 spaces is necessary or consistent with the ‘no more traffic’ pledge and ANPS targets. • Ensuring that the parkways are connected directly to the motorway network, and that they have limited access to the local road network. This will ensure that the traffic impacts of the parkway are focussed on the motorway network. • The use of additional car parking locations beyond the two parkways, in particular the proposal for parking facilities at T4 to be expanded to provide 2000 additional spaces. This location is not as assessable to the motorway network • HSPG are concerned about the physical size and scale of the Southern Parkway including the impacts on visual intrusion, noise, light and air quality. We also require the Southern Perimeter Road is routed to the North of the proposed parkway. • HSPG do not have a full understanding of how many spaces will be provided on each of the 10 parking sites or how those spaces will be allocated across different users such as employees, passengers car hire etc • Without seeing the traffic modelling, HSPG do not understand what impacts the proposed car park locations would have on local roads and the impacts this will have on congestion and air quality. HSPG therefore require more detail on the options tested before any support is given to the concept of consolidated parkways. <p>Whilst collectively, HSPG generally support the consolidated parkway concept subject to satisfactions being made with those affected local authorities, there is concern the locations shown are still not consistent with HPSG member bi-lateral discussions</p>
1.4	<i>Multifunctional Green Link</i>
	<p>HSPG supports the Colne to Crane Valleys multi-functional Green Link concept and welcome the introduction of useable walking and cycling (leisure and commuter) connection routes to and around the airport. However, considerable work remains to ensure movement and habitat linkages to areas beyond, and to ensure high quality environments and routes are provided. We welcome more consultation and more involvement on developing this into a useable and adequate space that can be used by pedestrians and cyclists to sustainably access the airport and move across green corridors. The component masterplan appears to show some parts of the Link that are very narrow, we query the status of the Green Link and functional purpose and value of some elements as proposed. HSPG request further detail on the functionality of the Green Link.</p>

	<p>HSPG seek further clarification on:</p> <ul style="list-style-type: none"> • Pilot projects and where they will be; • Clarity on strategic links into the Green Link, especially in areas where there is currently poor accessibility by pedestrians and cyclists; • The biodiversity offsetting metrics that will be used to obtain an understanding of new habitats that may be created, where and how net gain will be achieved; • Assurance that lifelong maintenance and management of any green and blue infrastructure proposed is address at the outset and woven into the DCO requirements / S106a. <p>See also the more detailed HSPG response regarding Green and Blue Infrastructure which is also submitted by HSPG (HSPG Heathrow Area Landscape Framework).</p>
1.5	<p><i>Airfield operations - full runway alternation and operational flexibility and resilience</i></p>
	<p>HSPG agree with the emphasis given to managing design and capacity to ensure full runway alternation, resilience, predictability of respite and introduction of a night time flight ban. Together with new flightpath operations (airspace change) this should reduce the number of people significantly impacted by aircraft noise.</p> <p>HSPG support measures to further extend the period of night time restrictions during the hours of night, 23:30-06:00, with a full ban on all planned flight operations for 6.5 hours and the exploration of arrangements for predictable respite through late evening and early morning.</p> <p>HSPG support measures to maximise peak period airport capacity so that the period and level of night time restrictions can be maximised for the whole of the night time period.</p> <p><i>North eastern taxiways</i></p> <p>We have concerns that the requirement for an additional north east taxiway has been included late in the design development process and even now are not being presented fully in the Assembly component masterplan Options. We would like to understand the detail of the two options for this element. HSPG are concerned that the DCO examination addresses all the airport works and operational changes necessary to achieve the maximum ATM, passenger and cargo targets proposed, even if some work may not be carried out until a later date.</p> <p>HSPG are concerned that the DCO examination addresses all the airport works and operational changes necessary to achieve the maximum ATM, passenger and cargo targets proposed, even if some work may not be carried out until a later date.</p>

1.6	<i>Passive Provision for rail line and service options</i>
	<p>HSPG continue to support the delivery of Western Rail and Southern Rail Access as set out in the position paper, and we would encourage Heathrow to take a stronger role in promoting these schemes. Please note the CVRP position is set out in their Position Statement of September 2018, provided with this response.</p> <p>In terms of providing passive provision HSPG would like to see;</p> <ul style="list-style-type: none"> • Provision for WRA proposals should include mitigation works in Buckinghamshire and CVRP and measures to reduce severance and traffic impacts including the Iver relief road and measures to improve public transport access into the airport from the north due to the loss of a significant north-south route. • Provision for SRA (Hounslow scheme) fails to protect the site for a tunnel portal nor does it promote appropriate uses in the location to support the development of a Bedfont Station on the Mayfield Farm site. • Potential for a light rail link from the airport to Staines town centre. <p>HSPG also support the proposal to upgrade the line between Northolt Junction and Old Oak Common, to allow Chiltern services to terminate at Old Oak Common. This would significantly improve access by rail, for both passengers and a currently underrepresented labour market, from the north and west of the airport.</p>
1.7	<i>Two M25 junctions</i>
	<p>HSPG has made its position on the requirements of junction access clear previously.</p> <p>We require the traffic modelling to see how the current conclusions were made. Further detail, modelling and explanation is required to demonstrate resilience to serve both Western and Northern Terminal Options, direct access from the M25 into Poyle Trading Estate and from the Estate to the airport, direct access for public transport and cyclists / pedestrians to the airport, and direct M25 access to the Southern Parkway under the option for the northern alignment of the perimeter road).</p>
1.8	<i>Utilisation of Rail transshipment</i>
	<p>We understand and support the replacement of the rail head in the north west corner for bulk material freight purposes. Although we wish to work closely with Heathrow to minimise land-take and impacts on green and blue infrastructure associated with the railhead and associated development. Both the</p>

	<p>future availability of train paths for the movement of construction materials and the long-term potential role of the rail head needs to be clarified.</p> <p>This is a strategic element and full details should be shared with HSPG as and when they become available as further deeper consideration is required.</p>
2	Spatial Planning
2.1	<p><i>Further ‘deep dive’</i></p> <p>Further deep dive session(s) required to investigate the ‘decision tree’ process for including or excluding required uses from the DCO, and details of site location and requirements for the range of ASF and ARD uses required to support full expansion, including: phasing; appropriate clusters of use an general location; to maximise dispersal from the operational airport as appropriate.</p> <p>On a type by type basis to identify: whether Direct or Indirect Employment; requirements/criteria for placement of each; scale of floorspace, open storage and site required; appropriate clusters / neighbouring uses; and scale of on-site employment. Existing floorspace, replacement of displaced floorspace, additional growth requirement floorspace and total space required. Whether in the DCO or other TCPA processes.</p> <p>Agenda to include:</p> <ul style="list-style-type: none"> • Decision tree process and DCO tests of ‘principal’ and ‘associated’ uses; • Scale of uses displaced, rational for replacement / non-replacement cumulative and combined impacts in the area; • ASF breakdown (as above); • ARD breakdown (as above); • Focus on geographic areas around the airport to review the combined and cumulative effects of proposals; • Housing impact - inclusion of construction worker/legacy housing in the DCO, use of temporary and permanent housing stock purchased, neighbourhood management and planning; • Scope and methodology for JEBIS updates and additions; • Options for the definition of the DCO ‘redline’ and other measures to ensure delivery of mitigation and compensation works.

	<ul style="list-style-type: none"> A detailed technical session could occur as per HSPG’s suggestion that, rather than the topic based ‘deep dive’ sessions held by HAL last September during development of the Assembly options, ‘geographic’ sessions are arranged focussing on key areas and addressing a range of inter-related technical matters, including land use.
2.2	<i>Relationship with JSPF</i>
	Outputs from the above are required to inform preparation of JSPF to address planning of the ‘residual’ growth to be planned for above existing baseline in the surrounding HSPG area; outputs required in Q2.
2.3	<i>Lakeside Energy from Waste (Grundons)</i>
	<p>Lakeside Energy from Waste Plant will be lost as part of the airport expansion. This facility is a key strategic element of modern waste management infrastructure. Its loss would have knock on implications for waste management capacity in the wider area and evidence needs to be provided proving there will be adequate capacity. Continuity in waste management is essential,</p> <p>We understand that the proposed Lakeside EfW relocation is to be in the north-west corner using TCPA processes in advance of the DCO application. The facility, with its associated MRF is of sub-regional importance and requires continuity in provision. The application is understood to be for will be a like for like replacement but that will need to address its Green Belt location/ policy in accordance with the NPPF, and the EiA will need to consider Heathrow expansion. HSPG request that HAL share information and respond to the short timescales needed to meet the construction programme if permission is granted by Slough Borough Council. The case for replacement should be demonstrated with evidence and a sequential site options assessment conducted to support use of Green Belt site. Such evidence should be presented to Slough and the HSPG.</p> <p>HSPG need to be confident that all other options for the potential relocation have been considered given the position of the current proposed site in the Colne Valley Park and Green Belt. Slough Borough Council are currently in discussions with the provider. HSPG requested site selection information is released urgently.</p>
2.3	<i>Immigration Removal Centre</i>
	<p>Further information is required on the absolute requirements and preferred criteria for the relocation of IRC and associated Home Office uses.</p> <p>We do not support the IRC being within the allocated Heathrow Gateway site (Mayfield Farm) within the London Borough of Hounslow and further alternative locations and co-locations should be seriously considered over the Mayfield Farm site.</p>

	<p>The proposal to relocate the IRC on to the Mayfield Farm site would conflict with rail alignment for the proposed Southern Rail Access (Hounslow option) and is incompatible with the promotion of a Bedfont Rail way station at the identified site promoted through the Hounslow Local Plan which is for a 'Heathrow Gateway' site to lead a step change in providing housing and commercial offerings in the locality.</p>
2.4	<p><i>Commercial use at the Southern Parkway</i></p>
	<p>There appears to be a desire from Heathrow to create a commercial opportunity to the south of the Southern Parkway (area JO2 on the masterplan) for the location of main town centre uses. What is the land use schedule plan for this site? More detail required on Heathrow's proposals on this.</p> <p>HSPG do not support proposals for out of centre development of main town centre uses that would fail to support the promotion of or undermine the continuing vitality and viability of the main town centres which are the appropriate location for such uses, including hotels. Furthermore, the use of open land and Green Belt is unlikely to be justified for such uses. HSPG would only support such commercial uses that do not hamper opportunity to promote nearby town centres and do not cause significant additional congestion / impacts.</p> <p>It has been suggested that if the commercial use does not come forward, then this area would become a 'green space'. Clarification required on this and the time period involved to ensure green space can be accommodated if commercial use is not viable.</p>
2.5	<p><i>Airport Direct and Indirect Related Development</i></p>
	<p>A detailed schedule (see 2.1 above) is required of the included ARD and AFS, by site, to identify in greater detail the categories of particular use, key locational requirements, where on/near/ far from the airport, floorspace & open storage space requirements, and scale of workforce employed on site.</p> <p>This will inform future discussion over the scope for alternatives, DCO decision tree, preferences for co-location and role of public transport.</p>
2.6	<p><i>Inclusion of matters in the DCO – decision tree</i></p>
	<p>More information needed on rationale for prioritisation of uses for inclusion in the DCO (see 2.1 above). Some decisions on what is a 'principal' or 'associated' use or is treated without the DCO appear inconsistent and appear arbitrary. e.g. 100% of hotels not entirely reliant on airport use have been included in the DCO, major ASF offices are without. Some re-provision is included some not. Position on the EfW plant, IRC?</p>
2.7	<p><i>Green Belt, Metropolitan Open Land, open space and natural environment designations</i></p>

	<p>A schedule and mapping detailing land parcels, quantity of area, uses, land take from green designations and quality of all parcels impacted is requested. We welcome this also being done through a workshop or session with HALs land use team.</p>
	<ul style="list-style-type: none"> • How will very special circumstances for DCO be assessed? • What support will be provided? • Clarity needed on cumulative/piecemeal assessments. • How can we look strategically at Green Belt/ the functions that parcels of Green Belt are currently providing, and have the potential to provide? <p>How is it proposed to look at Green Belt/MOL/open space strategically and on a site by site justification basis? Further information on Green Belt is covered in the sections below.</p>
2.8	<p><i>Dis-located dwellings and floorspace</i></p>
	<p>A detailed schedule of the floorspace and dwellings to be lost and the number of dwellings / location of dwellings likely to be purchased by HAL is required, we also request how many dwellings are likely to be retained for the construction period.</p> <ul style="list-style-type: none"> • What will HAL be doing to support the relocation of uses in the market whenever these are not being re-provided as part of the DCO? • How will cumulative impact of the loss of all the various land uses be assessed and addressed? <p>DCO should include justification for Local Authorities to bring forward ARD that isn't being provided for in the DCO.</p>
3	Transport
3.1	<p><i>Use of the Southern Road Tunnel</i></p>
	<p>HSPG seek further detailed information from HAL on how the Southern Road Tunnel will be used and by whom i.e. will it be for all traffic modes, only for freight, etc, what impact will this have on air quality and public health. There is no mention of an increase in bus links and how they could use the Southern Road Tunnel. See Key fixes section above (Section 1.1).</p>
3.2	<p><i>Modelling</i></p>

	<p>HSPG are concerned that there is insufficient information coming out of the modelling process which permits an audit of the assessment of the various scenarios and their impacts on the local road network. As an example, the decision on whether the South Western Parkway facility has a hard-wired access only to and from the M25, without any access via Surrey’s roads has a significant impact on the mitigation that might be required. The same applies to the location/ form of the hub/passenger transport interchanges on the southern and western boundaries of the airport. Further comments on the parkway proposals are in section 3.5.</p>
	<p>We request to see the traffic modelling that has been undertaken for the Southern Road Tunnel proposal.</p>
3.3	<p><i>Terminal 4 parking and location of PHV vehicles</i></p>
	<p>The proposed parking site will provide 6000 spaces instead of the initial 4000 that has previously been proposed and are already provided. HAL are reluctant to redistribute these facilities to the Parkway sites as it will increase the size of the Parkway locations meaning more land uptake. Clarity is required on the need for the additional 2000 spaces and how they will be utilised.</p> <p>HSPG require more information on the need for the parking at this location and the impact upon the southern perimeter road and the other local roads. We have concerns regarding the concentration of car rental and taxi parking in this area than dispersing these elements to other car parks. Further evidence on the potential implications of focussing these parking elements at T4 should be provided, including whether this provision would reduce the parking requirements at the northern and southern parkways.</p>
3.4	<p>It seems more sensible having the Car Hire and Taxi facilities closer to the motorway network. T4 is the least accessible area of the airport and will place car rentals on the south east side of the airport, when it’s more likely they’ll be needing to head away from London on the motorway network. Shouldn’t there be Car Hire facilities close to both the CTA (northern parkway) and to the Western terminal area (Southwestern Parkway)? These would then have both the combination of good public transport access, and direct access to the motorway network.</p>
	<p>Further clarification required on how the T4 Car Hire facility proposed be access from the strategic road network and how passengers will transfer to the airport. We require urgent publication off the Surface Access Strategy.</p>
3.5	<p><i>Controlled Parking Zones</i></p>
	<p>HSPG press Heathrow for confirmation that HAL will fund the implementation of a Controlled Parking Zone (CPZ) around the HSPG area that will be impacted upon by changes to parking and the road network. During member bi-lateral meetings it has been alluded to by Heathrow that ‘technology’ will be used to prevent illegal parking – please can we have more detail on this thinking and how it will work?</p>

3.6	<i>Parkways</i>
	<p>Further to the comments in section 1.3 we stress the need to see detail on how the parkways will impact on the local roads and what measures will be in place to reduce congestion. Real evidence and detail is needed now on this to ensure the transport sub-group and the wider HSPG membership can test the scenarios presented. The surface access strategy needs to show how movement around the airport and its perimeters will work.</p> <p>The T4 parking proposal is a concern on the potential traffic and congestion on the Southern Perimeter Road.</p>
3.7	<i>Southern Perimeter Road</i>
	<p>HSPG support the routing of the Southern Perimeter Road to the north of the proposed parkway. HSPG do not support routing of the Southern Perimeter Road to the South of the proposed Parkway. Routing to the north will reduce the likely noise and air quality impacts on the adjacent communities. HSPG prefer the Southern Perimeter Road being located to the north of the parkway allowing the parkway to have an adequate landscape buffer at the south towards the existing communities.</p>
3.8	<i>A3044 and A4</i>
	<p>There needs to be more evidence or detail about</p> <ul style="list-style-type: none"> a. Infrastructure provision for a low emission lane, and; b. (policies/incentives/restraint) for public transport and cycle access measures to address AQ and provide preferential journey times to private car; Plus, appropriate segregation to ensure road safety; c. Diverted A3044 routing: Slough do not support the option of a through route diversion through Brands Hill, Colnbrook and Poyle (as discussed in per bilateral discussions) d. The Colne Valley Regional Park also remain concerned about the impact of A4 diversion on the Park.
3.9	<i>Cycle and Active Travel</i>
	<p>We welcome the cycle study and the commitment to providing better cycling provision and access links into the airport. We would need to work with national and local cycle groups i.e.sustrans on the emerging cycle plan for the airport. This should also be expanded to include other active travel modes</p>

	<p>including pedestrian access from local communities. Appropriate ‘feeder’ routes, hubs and gateways for active modes should be provided in the design and cycle access provided in access tunnels.</p> <p>There is significant overlap with the proposals for green infrastructure.</p> <p>See also the more detailed HSPG response on Green and Blue Infrastructure.</p>
4	Environment
	The HSPG environmental sub-group has prepared additional Green and Blue Infrastructure supporting documentation which is submitted in support of this response.
4.1	<i>Air Quality and Noise</i>
	<p>Little information has been shared to date on the impacts of expansion upon Air Quality and Noise. Noted this will form part of the PEIR and Environmental Assessment, however, it is essential we understand the full impacts of these on the communities before we make any judgement.</p> <p>HSPG would like to see more detail on landscape / attenuation buffers and if they are intended to mitigate ground borne vibrations (construction and operational). Members particularly in South Bucks have anecdotal evidence that the current operation can be heard in Richings Park and the location of the third runway is likely to make this worse.</p> <p>Several workshops have been attended and it appears that this area is extremely under developed or information is being withheld. Additionally, it would appear the work we have seen is restricted to a relatively narrow ring around the airport when the impacts and potential impacts of a third runway are much wider.</p> <p>South Bucks has an AQMA as does Slough in Langley. Both require enhancement and protection of their conservation areas. The closure of roads and individual strategies will not deliver holistic measures to improve air quality or visual impacts to the residents of these areas.</p>
4.2	<i>Green Link (The Green Loop)</i>
	The Green Loop concept is supported. HSPG need reassurance this will be a useable space that will ensure pedestrians and cyclists are able to use it whilst also offering a buffer between the airport and communities. The sections of the Link should be designed to be wide enough to function effectively

	for the required purposes of the loop and each individual section of the Link network. Refer to the HSPG Heathrow Area Landscape Framework delves into more detail on the multifunctional Green Link.
	<ul style="list-style-type: none"> • How will the Green Loop link with other Green Infrastructure corridors already in existence?
	We have concerns that the alignment of the A4 could have potential implications on the effectiveness of the proposed green loop to the north of the airport and serve as a focus of future development. Further consideration of and justification for the realigned A4 in the context of the green link and green infrastructure is required.
	There are potential Green Links or corridors radiating all around the airport, with possible sustainable access routes not considered. The current proposed green ring appears of very limited width. How will it contribute to wider linkages? The consultants have said there would be linkages, but they are not well evidenced yet.
	The Landscape Design Vision and Landscape Concept Proposal is welcomed, and we welcome more focussed sessions to discuss this and how the interaction with the work HSPG / CVRP are undertaking. HSPG need assurance of how this will be maintained and managed, also when will this happen, during construction or after construction?
	Proposals for physical works must be supported by revenue measures to build use of ‘active routes’ and new resource. HSPG suggest a coordinator of local volunteer activity to encourage active use.
4.3	<i>Rivers</i>
	We are still lacking the detail relating to the covered channel. The principles listed in the deep dive session are encouraging, however, we need much more engagement and evidence of the efficacy of the covered waterways. We also need clarity on the disadvantages and limitations of the covered waterways as mitigation, and where the benefits of the covered waterways can be maximised’ further working groups on this matter are needed.
	More details needed, including how flooding will be improved in areas in Colnbrook and Poyle; and about waterbodies that form the Old Slade Lake complex. Care should be taken to be clear on plans where this element of the blue infrastructure is not recreational as it will have no visual amenity value.
	Measures need to be put in place to ensure that flood risk from the proposals include mitigation to reduce the risk of flooding for nearby residents. The excavated waste is proposed to be used to create bunds however the sites are former landfill sites. The extent and composition of the contaminants is not known and not shared (if known). The impact of this and the connection between the waste and contaminated land strategies being brought forward by Heathrow need to be joint up. The various subtopic workshops are demonstrating a disjoint in these subject matters. The movement of this material (soil and contaminants) will have impact on locals, species, AQ etc.

4.4	<i>Covered River Corridor</i>
	<p>We have concerns regarding the potential of the covered river corridor and whether the solution is realistic in terms of recreating a natural environment and meeting WFD criteria. The solution is also considered to be unsustainable in relation to provision of artificial lighting and will be challenging to maintain over future decades unless adequate testing can be carried out prior to construction. We welcome the Environment Agency’s official stance on this.</p> <p>HSPG welcome evidence and testing of this concept work now to enable design to be fine-tuned.</p>
4.5	<i>Flood Storage</i>
	<p>The presented plans do not show the entire land take required by Heathrow for expansion and mitigation. We are aware of potential flood storage sites stretching north of the expanded airport into Buckinghamshire. We want reassurances relating to the ‘hinterland’ of Heathrow’s proposal in terms of mitigation, surface transport and land use planning are shown. This will inevitably require separate plans at appropriate scales to be produced and consulted on, in order HSPG (and our affected members) to provide an informed response to the Preferred Option consultation.</p>
	<p>Of the 5 sites proposed for flood storage, Thorney Park is a former landfill site. The feedback provided under a previous work stream on land contamination highlighted all the areas which are contaminated, and it seems that the majority of the flood storage sites proposed are to be on or in close proximity to these. South Bucks would like to remind HAL of the existence of Strategic Flood Risk Assessment for Chiltern District Council and South Bucks District Council which provided part of the evidence base for the joint Chiltern and South Bucks Local Plan (2014-2036).</p>
	<p>In relation to flood storage:</p> <ol style="list-style-type: none"> 1) What is the expected land-take? 2) What the EA has had to say about these options? 3) Whether these sites can be brought forward through remediation? 4) How would the water be protected from contamination? 5) The spoil matter- where would this be transported to? (how many vehicular movements, where would it be treated and how does this tie in with the waste and land contamination work streams?) 6) HAL has indicated that the spoil would be used for building bunds and protection barriers, but would the material be useable? 7) How does HAL propose to ensure mineral resources (soils, overburden, Alluvium Clay, Silt, Sand & Gravel) are not sterilised and how would extraction effect hydrogeology? Would the depth of these sites be sufficient in capacity terms for the volume of water that might need to be stored there? 8) What are the chances of flooding to properties and upstream flooding because of realigning the Rivers? 9) Would these new ecologically enhanced areas (through mitigation) be accessible to the public or protected given the recent HAL meeting in which it was indicated that these sites carry European Protection designations?

	<p>10) How will they be maintained in the long-term and how will this process be managed? – would water body authorities get funding in perpetuity? etc.</p> <p>More details needed about how existing flooding will be improved in areas in Colnbrook and Poyle (as mitigation); and about infilling waterbodies that form the Old Slade Lake complex.</p>
	<p>It is crucial that the mitigation proposed in South Bucks (as a result of the 5 flood storage areas) is maintained in perpetuity. Whilst it has been said by HAL that these new water bodies will be the responsibility of the Riparian Water Authority, they are required as part of the expansion proposals. They will be required before the re-routing of the rivers can occur and the M25. They should not be considered as 'enabling works'. These flood storage areas are a requirement because of the runway and expansion proposals and thus the map needs to extend further North to capture South Bucks and to show the FSAs clearly. The redline boundary should be shown on all maps. The DCO Guidance indicates that land which is required by the developer forms part of the red line and I think it is about time that all the maps produced by HAL started to cover the full extent of its development proposals.</p>
<p>4.6</p>	<p><i>Green Belt (also see Spatial Planning comments)</i></p>
	<p>The extensive loss of areas of Green Belt and green space (including parts of the Colne Valley), this appears to be much greater in the updated masterplan compared with the accompanying ANPS.</p>
	<p>Currently the 'very special circumstances' test is being applied to individual parcels of land. We would like to see evidence of the alternative sites assessment (including the NPPF purposes of Green Belt). The NPPF requirement for an application is to judge that there is not an alternative site, this will automatically include the relative assessment of purpose. It is for Local Plans to review the strategic function of Green Belts as a whole.</p>
	<p>There is a need to seek to reduce the amount of Green Belt loss by trying to facilitate more development on previously developed land (PDL). More development should be dispersed to existing built up areas / nearby towns seeking regeneration.</p>
<p>5</p>	<p>Economic Development</p>
<p>5.1</p>	<p>These issues principally to be taken forward by engagement with HAL through Economic Development and Spatial Planning Sub-Group workstreams.</p> <p>The JEBIS outcomes need to be recognised as based on an 'as is' position: incl. (i) as evidence for interventions to alter current outputs if necessary, and (ii) the need to meet housing needs in the area in order that in commuting is not increased. The low job creation figure for Slough is justification that the surface access strategy needs to provide preferential access to communities close by (in Langley, Colnbrook and Slough) to enable them to access employment at the airport and business related or catalytic growth.</p>

	<p>Identification of the location of training facilities on-site and scale of provision to be engaged through relationships with networks of existing education and skills training providers including for life-long learning to reskill those in employment that is superseded by technology.</p> <p>(There is a general shortage of information on the physical provision envisaged to facilitate continuous retraining, 10,000 apprenticeships etc for the airport and supply chain employers).</p>
	<p>We would wish to see a much closer liaison HSPG on skills and employment issues, whilst we recognise some of the work will be outlined in the JEBIS / JSPF we believe that there is significant benefit of closer collaboration to ensure that the economic benefits are made available for the whole HSPG region and that the Local Industrial Strategies and other strategic economic development documents reflect the scale and potential of opportunity.</p> <p>We would want to ensure that this improved collaboration addresses the following strategic economic opportunities for the HSPG area: -</p> <ul style="list-style-type: none"> • Capitalising on the Regional Economic Opportunities being provided by the enhanced role of Heathrow Operating as Britain’s Global Gateway • Support the identification and delivery of the Skills Pipeline needed by Heathrow Airport, its partners and its local supply chains • Ensure that the business communities of the HSPG area are aware of and have the ability to compete for and win business contracts and procurement opportunities associated with the airport expansion. • Support the use of new technologies and innovation driven by the expansion of Heathrow Airport across the whole HSPG region. • Help identify appropriate employment land use opportunities to enable the effective, sustainable and locally supported economic growth enabled by the expansion of Heathrow Airport. <p>HSPG endorse any economic benefit of an expanded Heathrow. The economic benefits should be spread around Heathrow’s host authorities and into the wider SE region.</p>
	<p>A number of trading estates needs to have support for regeneration as mitigation and compensation to deliver jobs for local residents, for example (i) as a protected location for accommodating airport related or airport supporting development (ii) a suitable location for expansion to mitigate for displaced uses (iii) address current freight access issues (including safety) (iv) an opportunity for innovation in freight services or specialist airport services (v) the delivery of the “ Green Envelope” around it to provide positive connections with the local residential community in Colnbrook and protection from negative effects; and the connection with the Colne Valley Park.</p>

6	Construction
6.1	<ul style="list-style-type: none"> • Very little detail on construction sites and no reference in the component masterplan. • Where will the compounds be? • How long will they be there for? • What are proposed haulage routes and what will be the impact upon the local roads of construction, and construction staff, related traffic. <p>This is all information that is required now to mitigate the impact on HSPG’s communities. Further clarity needed or bi-lateral meetings to discuss potential sites.</p>
6.2	<p>The deep dive session relating to construction provided some detail on construction and the processes involved. HSPG need an assessment of the implications of construction on the local community, environmental impacts and transport impacts.</p> <p>The overall disruption caused by construction of the airport together with other major developments are needed to be assessed and relayed to HSPG at this stage. Has there been exploration of sharing construction sites or potentially sharing construction worker accommodation site with other major infrastructure providers?</p>
6.3	<p>The Masterplan has an expected focus on the operational development and design of the expansion. An assessment of the construction phase is required now as this will be over a significant and extended period with potentially significant impacts on the surrounding area. This will include:</p> <ul style="list-style-type: none"> - Construction worker transport - Construction worker accommodation – conflicting messages being delivered from Heathrow. HSPG expect construction workers accommodation to be included within the DCO – this should not be left to the market. - Pre-assembly of sub units at national hubs for transportation to site with further up-assembly near or on airport – where, how transport, implications for road infrastructure / congestion / noise, air quality,
6.4	<p>Concerns are still pending regarding the removal of hazardous materials from the site, this is still a real issue and potential stalling block for our members.</p>

7	Waste
7.1	<p>The existing Grundon’s waste facility would be displaced as a result of the expansion proposal and therefore its relocation should be considered as part of the DCO. Heathrow sends a significant amount of its waste to this existing facility and this needs to be disclosed together with the capacity of the current facility and throughputs and capacity gaps. Should capacity be met elsewhere by alternative facilities which have a capacity gap- the need would not exist. In addition, the waste strategy work being undertaken by HAL and the workshops to date have not mentioned waste streams. There are disjoints in the strategies.</p> <p>Various workshop presentations have presented different information. The deep dive indicated that waste would be managed on site at HAL. The flood storage areas meeting had with Neil Sheriff has presented the option of reusing the excavated material on site to create bunds, noting that 4 of these FSAs are former contaminated land sites and thus the composition of the soil/waste matter is unknown. BCC has not yet been approached by HAL to undertake ground investigations to establish the type of contamination at these sites. At the waste meeting presentation, there was a focus on waste not being transported more than 30 minutes away due to it being potentially hazardous and presumably because of the ‘proximity principle’? HAL ought to consider carbon footprint calculations in its HGV and various other movements to be generated by the construction and operational phase and to compare these to the current site relocation and travel distance criteria’s being applied.</p>
	<p>Whilst it is understood that the relocation of Grundon’s would form part of a separate DCO which is now expected to be in the public domain in January 2019, it is essential that the cumulative effects of these DCO projects are considered before the replacement of this facility can be justified. It would be necessary for the applicant to demonstrate that a need exists in the region (i.e. whether there is a capacity gap in the waste industry to justify the need for such a new facility). There have been a number of waste infrastructure projects implemented in and around the South East and Thames Valley which might have sufficient capacity to fill. This information should be shared in the project evolution stages.</p>
	<p>It is understood that HAL’s waste went to East London before the Grundon’s EfW plant came about. The reasoning behind the site selection and alternative sites analysis is something that HAL and the existing operator would know. This has not been shared. The impact of this facility relocating on the boundary to South Bucks in Slough’s Green Belt, alongside the re-routing of the rivers and M25 westwards, the flood storage areas in South Bucks and construction movements from these projects alongside the WRLtH will all impact South Bucks. These are in addition to the current HS2, CR and M4 works being in progress. These need to be considered in a holistic manner. This is something that the draft Code of Construction Practice (COcP) document is currently failing to address (HSPG will provide comments separately on the COcP)</p>
8	Airfield and operations
8.1	<p>Any airport expansion DCO should provide fully for the physical works necessary for the range of runway mode operations envisaged, including: frequent alternation of runway operating mode: all options of easterly/westerly preference: and measures to maximise peak hour capacity to allow the increase in the length of night time flight restrictions. e.g. additional taxiways in the NE corner.</p>

	<p>All physical requirements necessary to achieve the additional ATM applied for including the passenger and cargo capacity targets and maximum peak hour ATM capacity and flexibility should be identified in the DCO scheme. There needs to be a clear statement of whether the necessary works are to be constructed in the initial scheme DCO or as a firm option for later additional work permitted under the DCO or T&CPA process (e.g. the option for new NE taxiways).</p> <p>Provision must provide for complete operational flexibility to serve all terminals in all runway modes, with minimal taxing of aircraft under their own power (to minimise air quality and noise pollution from the effect of ground operations) between runways and apron areas (both terminal loading gates and aircraft servicing areas).</p> <p>Provision must provide robust resilience to airfield disruption, poor weather and other unusual events.</p>
8.2	<p>The HSPG has seen no compelling case to or justification or explanation of how an additional 265,000 ATM could be achieved under the existing two-runway configuration (presumably utilising the additional capacity created by use of new IPA flightpaths and easterly departures from the northern runway) set up notwithstanding the additional burdens imposed by the while construction work, is underway without exacerbating surface access congestions and air quality or impact of aircraft noise on local communities.</p> <p>Any early temporary increase in ATM under 2R modes should be only be conditional on the commencement from the same date of:</p> <ul style="list-style-type: none"> • introduction of the full proposed Night time restrictions, and • operational changes to reduce in the number of people significantly impacted by aircraft noise
8.3	<p>To assist the assessment of all land use options HSPG require:</p> <ul style="list-style-type: none"> • indicative flightpaths in all modes under 2R and 3R operations (including temporary or permanent additions serving Independent Parallel Approaches under 2R and 3R and options for change in Preference for Westerly Operations to a more Balanced Preference), and; • details of areas of impact of aircraft ground operation noise and AQ impacts. <p>This should quantify the affected population / sensitive uses for both permanent and any temporary flightpath arrangements.</p>
8.4	<p>Clear detail including larger scale plans are required for the two options for the new NE taxiways together with additional lands required for all options of operational standard and sound attenuation / landscaping barriers.</p>

<p>8.5</p>	<p>A clear comparison and explanation of the merits and drawbacks of the Northern and Western terminal options are required, so that the impacts can be following can be fully understood, to include impacts on:</p> <ul style="list-style-type: none"> • surface access into the airport; • on the airport boundary, and; • surrounding communities. <p>This should include:</p> <ul style="list-style-type: none"> • Impact on the alternation of runway mode, peak period airport capacity; • Taxiing of aircraft under own power to preparation areas, passenger embarkation gates, runway etc; • Impacts on adjacent areas outside the airport, including the noise and air quality impact of ground movements of aircraft and supporting services; • Passenger access; • Freight access; • Access to places of work by staff; • Location of airport perimeter '<i>control points</i>' for access by staff, freight and operational purposes.
<p>8.6</p>	<p>Plans should clarify and distinguish between the extent of clear open grass field, areas of hard surfacing for aircraft, for roadways and other purposes, and landscaping within the airport perimeter.</p>
<p>8.7</p>	<p>Clear identification of all access points to the airport for passengers, freight and 'control point' access to the airfield for staff (walking, cycling and vehicular) and operational vehicles.</p>
<p>8.8</p>	<p>Plans should explain the general strategy around the perimeter for the form / visual appearance of perimeter treatments: solid sound attenuation barriers, landscape bunds, buildings fencing, and areas designed for creating viewing points of aircraft movements.</p>

8.9	Future arrangements for air freight on the airport including customs set-up and consolidation / distribution for onward movement through the local logistics industry to be subject of detailed work in the new year. This needs to include consideration of the impact of Brexit on the rate and full potential for growth and change in air cargo through the airport and relationship with local logistics industry.
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