

## Appendix 2 to HSPG AEC response 13.9.19 (with map added on page 6) HSPG Green and Blue Infrastructure Headline Response

### Context

- This paper sets out the HSPG Green and Blue Infrastructure Sub-Group's response to the documentation provided with the June 2019 Heathrow Expansion consultation from the point of view of green and blue infrastructure hereafter referred to as 'GI'. It was agreed by the HSPG Green and Blue Sub-Group at its meeting on 21<sup>st</sup> August 2019.
- We are mindful of the major impacts on the green infrastructure and river systems.
  - 5 rivers diverted and placed in artificial channels
  - Approximately 1,300 acres of Green Belt/ MOL estimated to be lost to built development and infrastructure, most falling in the Colne Valley Regional Park.
  - The Green Belt (GB) in this area sits on the edge of the capital, is fragile and needs comprehensive improvement to function effectively as green space to benefit local communities affected by expansion (including for physical and mental health benefits), as well as wildlife.
  - The scale and intensity of commercial and other activity around the country's busiest airports means this area is subject to unusual pressures, requiring an area-wide and enduring response.
- The national policy and legislative context requires a comprehensive approach to mitigation, with a focus on river systems, access, biodiversity and recreation, including as set out in:
  - The Habitats Directive, Water Framework Directive and EU Birds Directive
  - The Biodiversity/ Environmental Net Gain requirement
  - The 2018 ANPS incl. "... the Secretary of State will consider whether the applicant has maximised such opportunities in and around developments, and particularly to establishing and enhancing green infrastructure." (Para 5.104)
  - The 2019 NPPF incl. "Where it has been concluded that it is necessary to release Green Belt land for development... they should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land." (Para 138)
- Heathrow Airport Limited (HAL) also aim for a high standard of legacy for green and blue infrastructure e.g.
  - "The combination of proposals for land.... will create a legacy of enhanced, more coherent, better connected and more resilient blue and green infrastructure. (Preferred Masterplan report Para 4.7.9)
  - "Heathrow recognises we are part of communities much greater than ourselves, and we want to be a good neighbour. Our goal is that our presence creates many more positive impacts than negative ones in our local area." (Text from Goal 6 in Heathrow 2.0)
- This headline response builds on earlier work done by HSPG, including its Position Paper on Environmental Principles and its Heathrow Area Landscape Framework.
- The HSPG's Vision for Green & Blue Infrastructure in the Heathrow expansion scheme

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(agreed December 2018) is included in Annex 2.

### HSPG Green & Blue Infrastructure Sub-Group Headline Comments and Outcomes Sought

HSPG Headline Comment	Outcome Sought
<p><b>1. Adverse impact on River Systems</b></p> <ul style="list-style-type: none"> <li>• We consider that there will be significant adverse impact on the river systems with risks associated with river ecology.</li> <li>• The details provided so far for design and mitigation are not robust or extensive enough, employing unproven techniques and creating river corridors that would not replicate natural river environments.</li> <li>• There is a lot of ambiguity/ assumptions within the PEIR with regard to the extent of works and application of mitigation.</li> <li>• Whilst mitigation may be proposed to address localised aspects we consider that the cumulative impact is likely to be significant when viewed at a catchment scale.</li> </ul>	<p><b>Greater information and certainty</b> around the mechanisms to be used to divert the rivers and create the new river corridors so that WFD requirements can be met and the future health of the whole river system can be assured. Clarity on how Covered River Corridors will be monitored and actions taken if not working.</p> <p><b>More natural river corridors planned</b> for - so habitats and species can thrive and the diverted rivers can contribute positively to attractive green corridors.</p> <p>We consider <b>additional land will need to be included in HAL's masterplan</b> to achieve comprehensive connectivity improvements on a catchment scale..</p>
<p><b>2. The preferred masterplan does not reveal or commit to a comprehensively improved landscape in the core zone around the airport</b></p> <ul style="list-style-type: none"> <li>• Various parcels of land needed for GI mitigation have been omitted from the DCO limits with uncertainty around delivery.</li> <li>• Even where land is included in the DCO boundary there is a lack of clarity re. the nature of improvements and public access, and some mitigation would not realise the land's potential for recreation/ landscape improvement as well as biodiversity.</li> <li>• The strategic layout and design of some areas of Airport Related Development and infrastructure intrudes on GI and diminishes the quality/ attractiveness of walking/ cycling routes.</li> <li>• The greatest impact on/ land take from the GB/ Metropolitan Open Land (MOL) lies on the western side of the airport and there is a lack of comprehensive improvement to the remaining GB/ MOL in that core zone (generally south of the M4 extending south to the A30/ Windsor-Staines railway line)</li> <li>• The result would be fragmented landscape improvement and a failure to provide a</li> </ul>	<p><b>More land included in the DCO boundary</b> and more improvement measures proposed in the masterplan to bring forward:</p> <ul style="list-style-type: none"> <li>- a more strategic scale of improved landscape in the masterplan, driven by place-making so there is a fitting GI Legacy with expansion</li> <li>- better connectivity for people so GI performs a high quality social function, and for wildlife</li> <li>- better revealing heritage assets.</li> </ul> <p><b>More detail</b> and commitments to include:</p> <ul style="list-style-type: none"> <li>- the nature of proposals for each land area parcel shown for GI/ mitigation</li> <li>- Archaeological investigations information</li> <li>- How environmental net gain is achieved</li> <li>- Clarity on the mechanisms to bring forward improvements that sit outside of the DCO</li> <li>- A draft schedule of the sort of conditions/ legal obligations HAL envisage attached to the DCO.</li> </ul> <p><b>HAL to develop a funded, wider area, GI improvement strategy:</b> To facilitate improvement of Green Belt/ MOL areas and other green spaces lying beyond the eventual DCO boundary so the full potential for connected, high quality and accessible, green space in the sub-region can be realised. Only through this can the dividends from the measures brought forward in the DCO be maximised and loss of Green Belt/</p>

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<p>fitting GI legacy.</p> <ul style="list-style-type: none"> <li>Lack of adequate archaeological investigations to inform design.</li> </ul>	<p>MOL compensated for.</p> <p><i>Note: See section 3 regarding specific connectivity outcomes for walking and cycling routes.</i></p> <p>DCO land implications and areas of concern re GI provision are illustrated in Annex 1.</p>
<p><b>3. Lack of a comprehensive network of high quality multi-directional walking and cycle routes across the masterplan area</b></p> <ul style="list-style-type: none"> <li>Multi-functional green loop welcome but active travel network not sufficiently developed as a concept. Those sections of routes shown do not combine to create an attractive, safe &amp; effective network of active travel routes across the masterplan area.</li> <li>Active travel routes across motorway/ infrastructure barriers inadequately addressed.</li> <li>From the G&amp;B point of view a higher quality and more extensive active travel network is necessary as part of the 'green legacy' to: <ul style="list-style-type: none"> <li>Provide the communities most affected by expansion with improved access to enhanced green space, supporting better quality of life</li> <li>Go towards mitigating the scale and extent of impacts on the Green Belt/ existing green infrastructure.</li> <li>Contribute to promoting healthier lifestyles and reducing car trips, traffic and carbon emissions, integrated with active travel routes for commuters.</li> </ul> </li> </ul>	<p><b>A more extensive and higher quality network for multi-directional, active travel</b> linked (where appropriate) to green and blue infrastructure across the masterplan area. This should build on the Joint Connectivity Statement (agreed and provided by BCC, SB&amp;CDC, SBC, RBWM &amp; CVRP) with land added to the DCO area to effect this.</p> <p><b>'Green Bridges' provided</b> in the masterplan area at intersections with motorways/ major roads and infrastructure to create attractive routes where these barriers exist.</p> <p><b>Routes that are attractive for use by both workers and for recreation</b> that can form part of a programme for improved longer distance networks - enhancing the existing network and create attractive connections with, and between employment locations, community, heritage, and countryside/ leisure facilities.</p> <p><b>Greater clarity re public access/ routes through each GI parcel</b> to demonstrate the connectivity benefits accruing from the masterplan.</p> <p>Assurance regarding the <b>long-term maintenance regime</b> (see below).</p>
<p><b>4. Lack of clarity around the commitment to high quality management and maintenance of the G&amp;BI and active travel network for the long term</b> (public and private realm)</p> <ul style="list-style-type: none"> <li>This will be a critical element of the proposals and proposals appear fragmented, whereas an integrated approach will be essential to ensure the legacy endures.</li> <li>The scale and intensity of commercial and other activity around the airport means this area is subject to unusual pressures and the propensity for abuse/ tipping/ litter etc., requires an area-wide and enduring response.</li> </ul>	<p><b>A comprehensive management and maintenance (M&amp;M) proposal</b> in perpetuity for the whole area around the airport, which addresses the need to maintain existing and new GI functions</p> <p>An holistic proposal delivering a <b>cared for Park across the whole masterplan zone</b>, not just for individual sites. Initially Heads of Terms are needed for an Integrated Management and Maintenance Plan (IMMP) to include:</p> <ul style="list-style-type: none"> <li>- A definitive map of all proposed HAL GI sites/ assets and other adjacent GI land not in the DCO</li> <li>- Quality specification, including for monitoring</li> <li>- A funding plan, M&amp;M period, organisational lead responsibilities/ arrangements for each asset.</li> <li>- Long term certainty e.g. covenants/ legal agreements</li> </ul>

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	<ul style="list-style-type: none"> <li>- Community involvement/learning arrangements (incl. through encouraging public use of GI/ healthy lifestyles &amp; apprenticeship programmes)</li> <li>- Links with LAs/ agencies engaged with the public realm</li> <li>- What is to be subject to the DCO and conditions “<b>Environmentally Managed Growth</b>” to embody a <b>strand</b> relating to the <b>natural environment</b>.</li> </ul>
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### ANNEX 1

#### Preferred Masterplan (June 2019) – some initial observations regarding G&B Infrastructure Provision

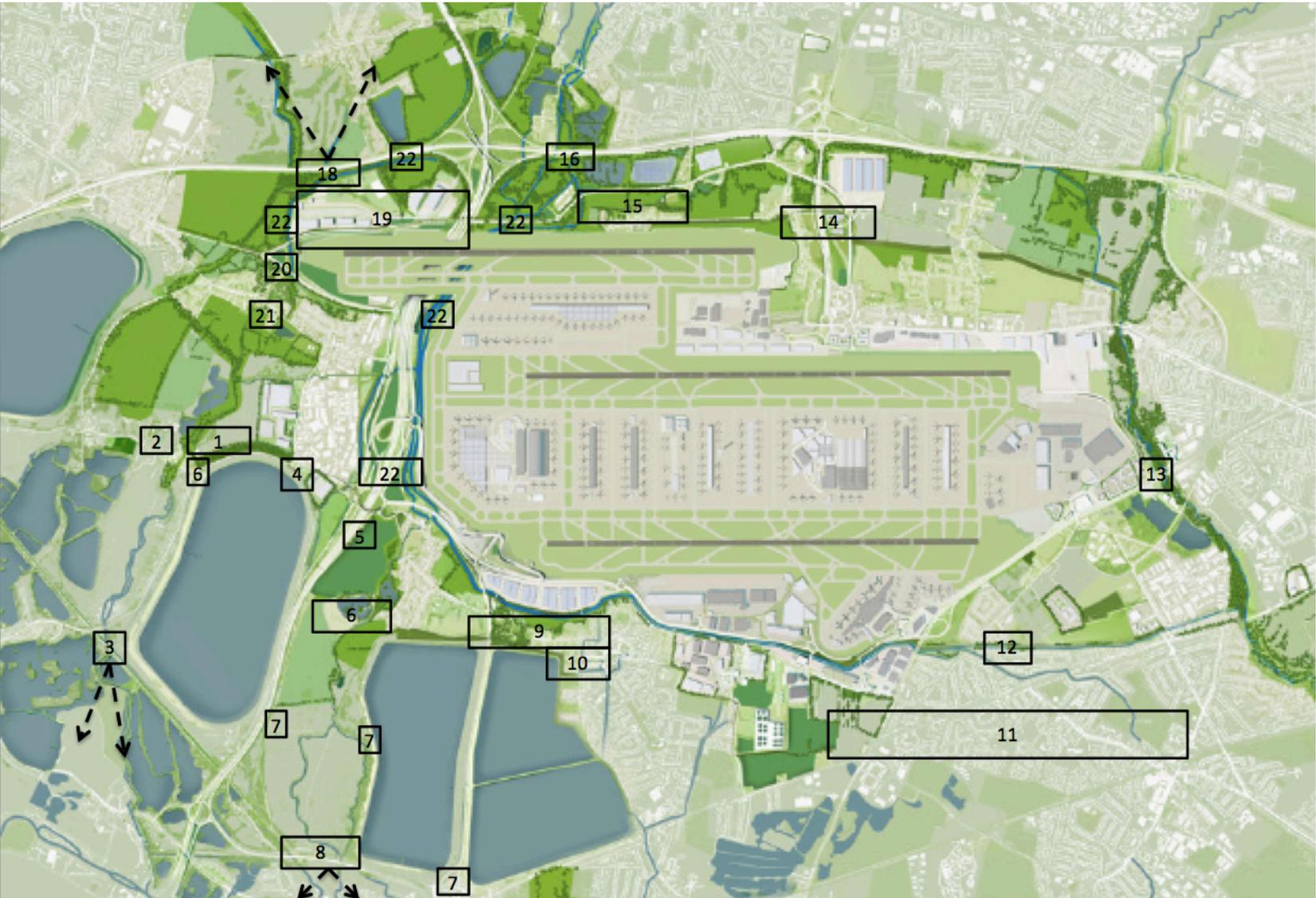
1. The HSPG’s G&B Sub-Group has reviewed the masterplan and considers that the comments and suggestions it made in December 2019 remain generally applicable and demand further consideration.
2. This note and accompanying annotated map:
  - Notes some shared concerns with aspects of the Preferred Masterplan from the G&B perspective
  - Identifies apparent gaps in GI land and identifies key areas where additional land needs to be included in the DCO to enable delivery of improved connectivity
  - It should be read in conjunction with the Joint Connectivity Statement from the 4 LAs and CVRP
3. We welcome continued engagement with HAL to explore solutions to our concerns.

Ref	HSPG’s observations (see map for indicative locations of references)
1.	GI land needs to be added to the north and south of the Poyle Channel and up to the Arthur Jacobs Nature Reserve to effect a ‘whole zone’ approach.
2.	GI land needs to be added around the existing Colne Valley Way and the listed Berkyn Manor Farm
3.	GI land needs to be added to connect to Wraysbury Station and to generally integrate with the Thames corridor/ emerging EA R Thames Scheme (linking with the agreed ‘Cemex’ restoration scheme)
4.	Whilst the ‘multi-functional’ Colne to Crane Green Link concept is welcomed the proposal appears undeveloped and needs to become a multi-directional set of corridors for both active travel and wildlife movement and showing how they will integrate with existing green corridors (including in urban environments). This general comment applies across the masterplan. The ‘4’ area is an example of how the alignment would not be attractive for active travel.
5.	Location of major severance - proper green ‘bridge’ required somewhere between J14 and where the Wraysbury River crosses the M25.
6.	Integrated ‘whole zone’ approach needed to the Stanwell Moor/ ‘Bretts’ area to realise its potential as a GI area integrating with Staines Moor <sup>1</sup> , adjacent urban areas and the GI area to west of the M25 (building on the agreed ‘Bretts’ restoration scheme).
7.	Active travel – multiple options to be pursued to cater for both work and recreation trips.
8.	Proposals needed to south of Staines Moor/ King George VI and Wraysbury Reservoirs to address barriers to movement and to generally integrate with the Thames corridor/ emerging EA R Thames Scheme/ Staines area - to ensure improved connectivity/ attractiveness for active travel.
9.	Poyle Place area needs to be included to deliver an integrated area of green infrastructure and revealing heritage, in conjunction with green park area to south of southern parkway.
10.	GI land needs to be added to ensure better linkages.

<sup>1</sup> An integrated approach also needed to funding/ operation of care and maintenance.

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11.	An area-wide strategy and investment is needed to link together green belt areas, green spaces, pocket parks and the Crane corridor to create green chains in the S-E quadrant of the masterplan for communities to utilise.
12.	General point about the 'Colne to Crane' multi-functional link particularly applies in this south-east quadrant as point 11 above.
13.	Specific proposals needed to address the barrier to movement in the Crane Valley at the A30.
14.	Specific proposals, including green bridges, needed to address how barriers to movement to the south of / around the northern Parkway will be addressed.
15.	The opportunity to really make something of Harmondsworth, its heritage assets and green hinterland, remains to be properly articulated. The (inaccessible) new water body to the south of the M4 and new roads potentially work against achieving the desired outcome.
16.	Specific proposals needed to address the barriers to movement/ motorway crossing points on the M4 to ensure improved connectivity/ attractiveness for active travel.
17.	Location of major severance - proper green 'bridge' required.
18.	Location of major severance - proper green 'bridge' required in a better location than the existing crossing point. Need to provide for active travel spokes north of M4 for workers and recreation. Land needs to be added to DCO to enable this. Potential for realignment of Colne Brook north of M4 needs to be reviewed further.
19.	Layout of whole zone needs further review from the GI point of view and for high quality green corridors to be created with attractive routes for active travel. Potential for realignment of Colne Brook north of M4 needs to be reviewed further.
20.	Location of major severance/ intrusion from roads/ their configuration – proposals needed to show how and how this will integrate with a green envelope to the north of both Colnbrook/Poyle.
21.	Connectivity for people as well as wildlife essential from this part of Colnbrook Village to GI area to south of the village – clarity needed on what is provided for.
22.	Significant adverse impact on river systems and risks associated with their ecology across all diverted rivers.



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## ANNEX 2

### HSPG's Strategic Vision<sup>2</sup> for Green & Blue Infrastructure in Heathrow expansion scheme agreed Dec 2018

#### 1. Minimise Green Land Loss

- Minimise land take from Green Belt, Colne Valley Park and other green space<sup>3</sup>
- Bring forward plans for enhancement of the local green and blue environment that fully mitigates and compensates for 'green' land loss

#### 2. High quality green space with excellent connectivity for people & wildlife

- A wide area comprehensively designed for recreation, sport, wildlife, countryside use and the enjoyment and appreciation of the local historic environment, fully mitigating for the extensive loss of Green Belt/ green areas
- Green & blue space laid out and promoted to lead to more active and healthier lifestyles for all, including hard to reach groups, those with disabilities and mental health issues.
- Creation of a world class green gateway to the UK for air passengers
- Creation of an attractive green lung, offering local communities green envelopes and outdoor respite
- Noise sources (vehicles and aircraft) mitigated to improve user experience along routes and in recreation areas, providing relative tranquillity
- Attractive routes that form part of a comprehensive 'sustainable' modes network
  - Improving/creating connections to/from communities, countryside destinations, heritage assets (and their settings) and places of employment with excellent, convenient, routes<sup>4</sup>
  - Providing a high quality countryside experience
  - Overcoming severance and barriers to multi-directional movement with high priority to sustainable travel at intersections and gateways
- When built development comes close to green zones....
  - Building scale limited to enhance the feeling of openness
  - Uses animating routes with natural surveillance and through layout/design
  - Excellence in the appearance of buildings, boundary treatments and landscaping to enhance the countryside experience
- Environments for wildlife and rivers resulting in a biodiversity net gain and creating high quality multi-directional wildlife connectivity via generous corridors without barriers
- Deployment of techniques such as green bridges to achieve high quality connectivity
- Robust measures implemented, guaranteeing protection from pollution incidents and reducing flood risk
- Green Infrastructure on and off airport positively contributing to climate change adaptation

#### 3. Secured comprehensive management for the long-term

- An edge to edge, comprehensively managed landscape
- Funding in perpetuity for high quality land, water body and route management including monitoring<sup>5</sup> and regulatory enforcement within green infrastructure areas
- A quality of life fund to engage communities and improve green areas
- Certainty about the future of green infrastructure and Green Belt permanence

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<sup>2</sup> Reference should also be made to HSPG's Heathrow Area Landscape Framework and to its Environmental Position Paper (also embraces the construction phase)

<sup>3</sup> Applying the very special circumstances test, assisting the regeneration of existing urban areas/ town centres

<sup>4</sup> Forming part of the Surface Access Strategy

<sup>5</sup> Parks to Green Flag standard