



Heathrow Airport Expansion Programme Development Consent Order
(Document REF 10000-XX-SY-XXX-100020)
(Published 1st September 2025)

**Joint Local Authorities' Response to the Applicant's Environmental Impact
Assessment Scoping Addendum**

Provided by the Heathrow Strategic Planning Group (HSPG)

HSPG collated response – EIA scoping points

Introduction

1. This response to the Environmental Impact Assessment (EIA) Scoping Addendum highlights areas of common agreement held by eight local authorities surrounding the airport, namely Spelthorne Borough Council, Elmbridge Borough Council, Runnymede Borough Council, Surrey County Council, Royal Borough of Windsor & Maidenhead, Slough Borough Council, London Borough of Ealing and London Borough of Hounslow.
2. These councils are all members of the Heathrow Strategic Planning Group (HSPG) a non-statutory partnership of Local Authorities working together to ensure a strong local authority voice in respect to matters relating to the current operations and future growth at Heathrow Airport.
3. The response has been collated by the HSPG secretariat based on a review of the documentation available, further informed by comments and reflections from technical officers from across our membership - including through discussions at a number of our thematic technical officer working groups held in September. A draft was consulted on with lead planning officers via email prior to this submission, in line with our standard approach to member engagement and the principles as set out in our [Accord](#). Minor amends were made by the secretariat on the 1 October following feedback from members.
4. The focus of this collated response from HSPG is on key strategic environmental impacts with import across the wider Heathrow region. In most cases individual member councils have also provided their own response, which will generally seek to highlight issues of particular local concern.
5. The intent of a joint collated response by HSPG is to provide the Examining Authority and the applicant with a clear steer on issues of shared and high-profile concern amongst our members, who form the majority of the local authorities impacted by the scheme.

Executive summary

The 2018 EIA is now 7 years old and needs updating as part of the package of documents required to justify the proposed Northwest Runway and associated development.

The overall approach proposed in the EIA scoping approach is very comprehensive, but there are gaps in the themes to be reviewed and some inconsistencies to address. For example concerning energy supplies, ecology and the cumulative impact of development – particularly in respect to the H8 Business Plan and regulatory package for airport activity growth (2027-31), the majority of which seemingly sits outside of the DCO process.

The acknowledgement of new legislation and guidance to take account of in the EIA scoping, plus the recognition of the importance of the Supreme Court decision on

Finch and the recognition of evolving guidance from bodies such as IEMA is welcome.

There is a need for future proofing in the assessment to address the operation of the proposed third runway and anticipated annual increase in aircraft capacity and size, air passenger numbers, cargo, and the volume of surface access traffic increase. There is clearly large amount of uncertainty inherent to the assessment of the impacts of such a development with a construction time of nearly three decades, with significant challenges for both the applicant and local planning authorities in defining and agreeing the key assumptions needed to understand all the impacts of the scheme, impacts that will stretch many years into the future.

HSPG members believe that acknowledgment of this uncertainty is key, and a flexible and ongoing provision for the monitoring and management of environmental impacts therefore necessary. To this end we have called for a controlled growth arrangement such as that defined through the recent Luton Airport DCO to be explored and agreed as soon as practicable. In tandem, there is also a need for an ambitious and ongoing community compensation scheme to ensure resourcing is available to mitigate both known and unknown impacts across the next thirty years. We look forward to discussing this further with the DCO applicant in the coming months, recognising that much good, collaborative work was done in this space prior to the DCO pause in 2020.

HSPG, as a grouping of Local Planning Authorities significantly impacted by Heathrow confirms its willingness to engage with the promoter, Heathrow Airport Limited, and PINS in considering the impact of the proposed development.

One strategic issue that is urgent now that assessment work is seemingly well underway is the need for a resource plan to be put in place with HSPG and its Local Planning Authority members to enable the necessary technical engagement to be undertaken comprehensively and at pace. Regrettably, there was no engagement with HSPG prior to the EIA scoping addendum being released (despite being named as a key consultee in most chapters). We understand that some bilateral meetings were held with individual councils to discuss the workplan at a high level, however not all of our members were able to accommodate these before the consultation went live. Together this has inevitably impacted on HSPG and our members councils' ability to engage with the material by the required statutory deadline for this consultation. We are hopeful that this issue can be resolved to allow for more effective and efficient engagement moving forward.

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1. Nature of the scheme and HSPG Background Documentation

HSPG as a partnership does not have a position collectively that supports or opposes the proposed Heathrow development. But if the scheme is to proceed HSPG is concerned to secure the best development possible that has considered all relevant issues thoroughly.

The strategic aims and objectives of the HSPG partnership are summarised in our Outcomes Framework (attached as Appendix 1). This articulates a shared vision for sustainable growth across the Heathrow area. In particular it summarises the expectations held by HSPG members in respect to the design of any expansion scheme at the airport, and the likely required mitigation for such a scheme to be acceptable in planning terms.

The latest Outcomes Framework was prepared during 2025 across all our technical officer working groups and is now pending final endorsement by elected leaders and portfolio holders – anticipated in October 2025 (this will supersede the previous Statement from 2018).

Member LAs therefore wish to see the Outcome Framework considered through the EIA assessment.

Of particular note are the HSPG aspirations to ensure that growth of Heathrow secures local economic benefits but is also subject to an environmentally controlled growth regime. An emerging approach, termed Environmentally Managed Growth (EMG) by Heathrow, was being explored pre DCO pause in 2020. Under EMG an agreed set of metrics would act as limits to ensure that the rate of flight increases is monitored alongside metrics for noise, pollution, traffic - with an independent scrutiny panel set up to ensure such metrics are not exceeded.

Other Relevant HSPG Documents

The HSPG [Vision and Principles document](#) was produced by HSPG members in conjunction with Heathrow Airport Limited in 2015, following the publication of the Airports Commission Report, which effectively supported the north-west runway at Heathrow Airport. It sets out key objectives for future airport expansion ahead of Heathrow developing a DCO scheme. Whilst this document relates to the previous DCO scheme, many of the key principles remain extant and supported by HSPG members.

In 2020, HSPG published an [Economic Development Vision and Action Plan](#) (EDVAP), an action-focused Plan to help maximise the economic productivity, skills, jobs and business development in the HSPG area, through the prism of Heathrow airport economic activity, either current or triggered by potential expansion. The EDVAP should be read alongside the action plan and evidence base. The EDVAP was a substantial piece of collaborative work and the partnership is looking to renew and update this in the light of a new DCO coming forward.

In 2020 the HSPG also published a [Joint Spatial Planning Framework](#) (JSPF) for the sustainable development of the sub-region, to address the implications of both 'baseline growth' and the additional growth demand forecast to result from the expansion of Heathrow Airport over the next 30 years. This responded to Government policy and the proposals of Heathrow Airport Limited, to construct a new Northwest Runway.

2. The EIA scoping Report - key points

The 2018 ES needs updating as 7 years have now passed.

- There is a need to consider legislation, guidance and policy that has been passed since the 2018 ES was concluded.
- The refresh of the EA will also need to address the publication of the new ANPS and other related aviation strategies to be published by the Department for Transport over next 12 months or so. New key evidence and technical guidance on assessment will need to be considered including that currently being considered by DfT/CAA in relation to attitudes to night flights and aircraft noise.

- A new baseline also needs to be established. Baselines to the 2018 study are now too old. Heathrow's 'business as usual' growth plans bid reflected in the "H8" Business Plan (2027-2031) will lead to over £10Bn investment and additional 10mppa and 20% cargo growth but largely within the same airport perimeter – effectively a further 'baseline' at 2027-31 to consider in the ES.
- Airspace Modernisation Strategy for the London TMA to take effect from 2027 impacting the routing of aircraft.
- There is a need to address the cumulative effects of implementing measures such as H8 on transport, economic development and other policies, plus the implementation of other strategies such as introduction of Full Alternation of Easterly Operations at Heathrow (Government approved over 15 years ago and subject to a current planning application), the Airspace Modernisation Strategy (and CAP1616 ACP processes) and the implementation of the West London Waste Plan.

There are some other issues that we believe are missing from the EIS scoping addendum and need to be addressed:

- There is no ecology and environment chapter.
- There is a gap on the consideration of the energy networks and the current limits affecting the areas to the West of London and within West London. This is a key contemporary consideration for local planning authorities with significant impacts on the acceptability and deliverability of development in west/west-of London. The impact of airport growth on these needs detailed consideration and in particular it must not be the case that all available headroom in the energy network is taken to support aviation needs at the expense of other employment and residential development.
- While the London Plan 2021 is referenced there is a need for the detail contained in current adopted Local Plan policies from across our membership to be considered.
- The report does not reference Heathrow Airport Ltd's designation as a Category 2 responder under the Civil Contingencies Act 2004. This statutory duty is central to its obligations in emergency preparedness, business continuity, and information-sharing with Category 1 responders.

There is also a major uncertainty over whether the proposal will continue to meet the current ANPS (para 1.15) requirements for a northwest runway an "at least 3500m and enabling at least 260,000 additional air transport movements per annum" at Heathrow. The 2018 ES was predicated on these requirements. If the runway finally proposed is shortened or moved, then a fresh ES may be required addressing changed aircraft operational patterns and noise effects, as well as reduced impacts on infrastructure including the M25 motorway.

There are also elements from the 2018 ES that now appear to be being downplayed and/or removed. There are issues not mentioned in current high-level statement of the proposed HAL expansion in their 31 July proposal to government, which were key

proposals in 2018. These changes concern the levels of job creation, controls on increases in the volume of traffic and a commitment to exploring the concept of Environmentally Managed Growth.

3. Scope in general

New legislation has been passed since 2020 that the EIA scoping should consider as these change the context in which the Heathrow expansion should be considered.

This new legislation includes:

- Business and Planning Act 2020 (Royal Assent 22/07/20)
- Air Traffic Management and unmanned Aircraft Act 2021 (Royal Assent 29/04/21)
- Fire Safety Act 2021 (Royal Assent 29/04/21)
- Environment Act 2021 (Royal Assent 02/11/21)
- Building Safety Act 2022 (Royal Assent 28/04/22)
- Levelling Up and Regeneration Act 2023 (Royal Assent 26/10/23)

A number of these are not referenced in the EIA scoping report addendum. This reference indicates which chapter and policy theme they should be considered under.

The National Planning Policy Framework and related Planning Practice Guidance are regularly updated. The most recent edition is the NPPF (2024 edition).

There is a need to take account of the scope of the impact of the Finch judgement at the Supreme Court which concerned the application of EIA, however this is an issue comprehensively discussed in the scoping addendum.

- Reg 18(3)(b): an ES must include a description of the likely significant effects of the proposed development on the environment.
- Schedule 4 para 5: the description of the likely significant effects of a project should cover “the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development”.
Finch was also important when considering the meaning of “effect”, “likely” and “significant”.

The need for a PEIR

One key point to raise is that the ES Scoping Addendum doesn't appear to reference a Preliminary Environmental Impact Report /stage. There is concern that this approach will limit the opportunity for further consultation on technical methodologies and datasets as we won't see anything further until the ES is published. By that point technical modelling will be complete perhaps with elements of data inputs for example that don't meet Local Authorities requirements.

‘The comments in the 2018 EIA Scoping Opinion will be addressed in the ES and specific commentary is only presented in this EIA Scoping Addendum where it is proposed that an approach will be taken in the ES that differs from the position in the

2018 EIA Scoping Opinion. Where this is the case further information and justification for the proposed approach is provided.'

The 2018 scoping report referred to a PEIR. However, the addendum report only refers to an Environmental Statement. The applicant should clarify whether there will be a fresh PEIR, how the scoping addendum would apply to that stage of assessment and how stakeholders will be engaged in this.

As per the comment above the spatial nature of the environmental disciplines means that for consultation to be effective a master plan and design options need to be shared with consultees.

The paragraph above from the executive summary seems to indicate for the next step is the publication of the ES. Several areas of the scoping report refer to design-based mitigation, when will consultation on design take place?

Study Area coverage

There is some ambiguity over the fact that study areas for noise, land, air quality and transport etc extend beyond Greater London boundaries, yet only Greater London guidance is referenced in the addendum overlooking other regional guidance and policy when clearly for example transport will impact on a far larger study area.

Baselines

The EIA scoping report addendum records '*Changes in baseline conditions have informed the approaches presented and full baseline information will be presented in the ES.*'

HSPG is concerned that there will not be a further consultation stage prior to the ES, such as a PEIR, yet the Covid pandemic had a noticeable effect on baselines. This needs to be taken into account when setting new ones.

Failing to consult on the detail of the baselines prior to the ES and therefore at a stage where the majority of environmental modelling will be complete, does not give Local Authorities an opportunity to comment on the baseline in time to ensure our requirements are considered within technical modelling for air quality, climate change, flooding, noise or for land contamination assessment.

There will be impacts on the EIA baseline from growth and modernisation planned by implementation of HAL's H8 business plan – not least additional passengers 10mppa and 20% air cargo growth within the existing ATM – therefore by use of a changed aircraft fleet and destination mix using larger aircraft and achieving higher load factors while in face of increased competition from expansion at other London airports.

As part of the update of baselines is the need for sensitivity testing of future scenarios (e.g. worst-case flight paths, traffic volumes etc.) to ensure robustness.

The current National Risk Register (2023) is not cited. The scoping should demonstrate how the NRR's priority risks (e.g. extreme weather, CBRN, power

disruption, malicious attack) have informed the hazard assessment and mitigation planning.

Finally, there should be consideration of Local Plan policies from individual adopted Local Plans and any new Local Plans that have reached Regulation 19 and can be considered to be 'advanced' and have 'weight'.

A detailed timetable and aircraft movements

The EIA scoping report addendum records *'It is anticipated that the enabling works described within the EIA Scoping Report would be undertaken between approximately 2030 and 2034. The airfield expansion between approximately 2030 and 2054 with the runway operational in 2035, and the campus development to be from approximately 2030 and fully developed by 2054.'*

More detail on the phasing of the expansion is needed and the metrics for assessing the impact of the growth in operations needs to be set out and considered.

It is suggested that there will be no changes to operations beyond those proposed in 2018. No detail is given as to what that means in terms of aircraft movements for example. How will the implications of expansion at Gatwick and Luton be assessed?

The approach described utilising indicative flight paths does not explain whether there will be any sensitivity testing in terms of considering a conservative assessment/worst-case scenario of the flight paths for air quality and noise. We expect a precautionary worst-case approach to be taken.

Without such a sensitivity test it could be the situation that the outcome of airspace changes result in worse air quality or noise than is being assessed in the forthcoming ES, therefore it would be reassuring if a conservative principle could be applied to the assessment such as a sensitivity test.

Consultees

There is no reference to consultation with the relevant Local Resilience Forums (London Resilience Forum and neighbouring Surrey LRF). Heathrow's major-accident and disaster risk assessments should be informed by the Community Risk Registers and multi-agency emergency arrangements of these LRFs, with clear commitment to joint planning, exercising and mutual-aid agreements.

Assessment Methods

Change in critical evidence around the assessment of Aircraft Noise and its impact on populations and individuals. The long-awaited Aviation Night Noise Effects (ANEE) study and updated Aviation Noise Attitudes Study (ANAS) are reporting to CAA/DfT shortly and will supersede and replace the Survey of Noise Attitudes (SONA). These are expected to lead to changes during in 2026 to national policy, noise threshold levels (through LOAEL and SOEL) but critically also assessment methods and scoping. Scoping (para 1.3.1 on baseline information) refers.

It would be helpful for HAL to confirm how emerging studies (e.g. ANAS and ANNE which are expected to supersede the SONA) will be integrated into the ES methodology.

It would be helpful to clarify how cumulative effects will be spatially and temporally scoped, and whether in-combination assessments will be scenario-based.

4. Commentary on the EIA scoping report chapters

The chapters of the EIA scoping report addendum are now considered in order.

Chapter 5 - Air Quality and Odour

a. New legislation and guidance

The EIA scoping study needs to consider the UK Clean Air Strategy 2019.

The ANPS is to be updated which will raise policy implications that the DCO will need to address.

DEFRA has published new guidance in 2024 needs to be considered.

It would be helpful for HAL to confirm how emerging studies (such as ANEE, SONA) will be integrated into the ES methodology.

b. Proposed Scope

There is a need to consider both air and surface traffic.

London Plan (2021) and London Environment Strategy are rightly identified for consideration in the scope of the policy.

The impact of the proposals on a series of SACs, Ramsar sites and SSSIs needs consideration.

The potential for managing air quality and other effects by requiring a stepped operation of the proposed third runway with agreed metrics acting as limits which should not be exceeded as the use of the new runway grows. The earlier version of the scheme included a proposal for environmentally managed growth which should be considered further as the means to ensure the impacts of the additional growth is monitored and managed effectively.

Heathrow Airport is currently funding ongoing monitoring of Ultrafine Particles (UFPs), as part of their contribution to this growing area of research, but UFPs are not assessed in the context of the DCO Project. This is seemingly a gap in the scope of the EIA.

The 2018 scoping report referred to an Air Quality Expert Review Group (AQERG). What is the current status of this group, and will they retain the roles previously described? The 2018 Scoping Report referenced the Air Quality Expert Review Group – a group consisting of experts from four UK universities to provide

independent advice focussed on approach and methodology and preliminary consultation prior to wider stakeholder engagement. Will this group provide technical scrutiny over the modelling? If so, would it not be appropriate to include an industrial specialist with appropriate ADMS experience on strategic infrastructure projects in the group going forwards.

There will be changes in how aircraft taxi around the existing runways and the new runway and additional terminal. How will this be accounted for in the air quality assessment? Appendix 5.1 Dispersion modelling methodology refers to 3. Aircraft engine ground running and testing, It is not clear whether the methodology includes aircraft that are travelling to and from the runway and further clarity is sought.

Appendix 5.1 Dispersion modelling methodology 1.1 Sources seemingly overlooks several sources adjacent to the airport such as hotels and related car parks that could be expected to develop with the scheme in place. Additional delivery traffic, private hire traffic to hotels and servicing traffic travelling to the development itself and associated businesses once the scheme is operational are not obviously included.

Future scenarios 1.2.16 refers to peer review of predictions around fleet that was currently underway in 2018. Has that work continued, or is it complete? No comment on this seems to have been given in the scoping addendum.

Consider regional and local policies from all affected authorities relating to air quality.

c. Proposed Data

New data is needed as the ES 2018 is now significantly out of date.

Baseline changes will arise as the H8 business plan is implemented – clarity is sought as to how this will be reflected.

As part of the update of baselines is the need for sensitivity testing of future scenarios (e.g. worst-case flight paths, traffic volumes etc.) to ensure robustness.

d. Proposed Study area

There is some ambiguity over the fact that study areas for noise, land, air quality and transport etc extend beyond Greater London boundaries, yet only Greater London guidance is referenced in the addendum overlooking other regional guidance and policy when clearly for example transport will impact on a far larger study area.

Following on from the comment above so far there's no content regarding regional compliance and how assessment would be made as to how the development could impact upon national targets etc for example PM2.5 pollution regionally despite new legislation since 2018.

Where London guidance for air quality is more stringent, we should seek a commitment to that standard across the scheme/ all assessment areas. That's important for construction emissions from Non-Road Moveable Machinery for

example where London has guidance in place. This is the approach Runnymede asked for on the River Thames DCO Scheme for example.

Chapter 6 - Biodiversity

There is a need for a chapter on ecology and the environment.

a. New legislation and guidance

New legislation to consider includes the Environment Act 2021 (Royal Assent 02/11/21) on NSIPs and Biodiversity Net Gain (BNG).

The Planning and Infrastructure Bill has not yet completed its Parliamentary consideration, nor received Royal Assent, nor have any guidance and statutory instruments been published and the dates for different clauses coming into force are yet to be published. As a result, a precautionary approach should be taken to address existing obligations relating to the Habitats Directive and the potential impact on SACs close to Heathrow remain. SACs close by include – Windsor Great Park and Burnham Beeches.

b. Proposed Scope

Consider the impact on SSIs, nearby SAC and Ramar sites.

Consider the implications from the NPPF, NNNPS (2024) and London Plan (2021), and include consideration of adopted Local Plans in the Districts surrounding Heathrow.

It is welcome to see that the EIA scoping assessment is to follow CIEEM guidance.

Consider regional and local policies from all affected authorities on biodiversity.

c. Proposed Data

Address impact of baseline changes resulting from the implementation of the H8 business plan.

Update surveys will be required.

d. Proposed Study area

The study area needs to be as wide as appropriate to ensure that all impacted priority areas of protection as assessed.

Chapter 7 - Carbon and Other Greenhouse Gases

Carbon is an important issue for design of scheme and its overall acceptability in planning terms.

a. New legislation and guidance

New legislation to consider includes the Environment Act 2021 (Royal Assent 02/11/21).

The Department for Transport has published its new [Quantifiable Carbon Guidance \(QCG\)](#), setting out how local transport authorities should prepare and use carbon analysis to inform transport strategies and schemes.

- To support this process, the Carbon Assessment Playbook (CAP) has been developed jointly by the Sub-national Transport Bodies (STBs). It provides:
- Carbon baseline dashboards for each local transport authority, showing how emissions are forecast to change over time.
- A policy builder that enables users to assess the potential carbon reduction impact of different interventions

The Heathrow scheme should have regard for this guidance when assessing surface access implications.

Other studies that HAL identifies as forming part of the scope of the EIA scoping assessment includes the reports Decarbonising Transport (2021) and the Jet Zero Strategy (2022).

The London Plan (2021) is a key reference document, but there is a need to consider other adopted Local Plans for the surrounding Boroughs and Districts too.

As the HAL study identifies the PAS guidance (2023) and IEMA (2022) have published key guidance to apply.

The Supreme Court case of Finch (June 2024) is comprehensively referenced, plus the 2021 carbon budget order. These all have a key role to play in shaping the EIA.

b. Proposed Scope

Without a firm commitment to either the western or southern rail schemes the levels of carbon associated with the Heathrow expansion arising from surface access may be difficult to ascertain.

There is a need for the EIA to take account of baseline changes that will result from H8 business plan investment package as well as cumulative impacts.

Land use changes arising from loss of mature trees in the construction period need to be properly considered in respect to net carbon.

There is impact on the environment from construction, air transport, surface access transport, buildings and group operations to fully consider.

HSPG would welcome early dialogue with HAL on how EMG principles could be embedded in the DCO and monitored post-consent.

c. Data & Baselines

As part of the update of baselines is the need for sensitivity testing of future scenarios (e.g. worst-case flight paths, traffic volumes etc.) to ensure robustness.

It would be helpful to clarify how cumulative effects will be spatially and temporally scoped, and whether in-combination assessments will be scenario-based.

Chapter 8 - Climate Change

a. New legislation and guidance

In addition to considering the Climate Change Act 2008 and Net Zero Target Amendment Order 2019, new legislation to consider includes the Environment Act 2021 (Royal Assent 02/11/21).

The National Adaption Programme (NAP3) and 4th strategy for Climate Adaption Reporting (2023) also form part of the evidence base for the scheme, together with the ANPS 2018, NNNS (2024) and the forthcoming update to the ANPS.

Spring 2025 CCC budgets – accepting airport expansions but conditional on other improvements (domestic heating, e-cars etc) to provide carbon budget for aviation growth. This adds to cumulative and combined impacts issue.

The London Plan 2021 is referenced, but the EIA scoping should also include examination of issues arising from the adopted Local Plans from surrounding Districts.

The EIA scoping report also notes the intention to follow IEMA guidance.

b. Proposed Scope

The baseline has changed since 2018 EIA and this needs to be updated.

Implementation of H8 business plan will also impact on the baseline.

As part of the update of baselines is the need for sensitivity testing of future scenarios (e.g. worst-case flight paths, traffic volumes etc.) to ensure robustness.

The intention of the EIA scoping study to use UK-CP18 and CIMP6 and their updates as they are published.

HSPG would welcome early dialogue with HAL on how EMG principles could be embedded in the DCO and monitored post-consent.

Chapter 9 - Community

a. New legislation and guidance

There is no new legislation and guidance impacting on this topic.

b. Proposed Scope

The key policy context is the ANPS and the updated NPPF/NNPS (2024 editions)

From the HAL document Third Runway “Proposal to Government” (2025) there is a lack of detail on the Community Mitigation Scheme and a proposed Business Rate review (as set out in ANPS). More detail is needed.

Community priorities as set out in CIL schemes and the policies from Local Plans adopted by HSPG member Councils should be considered.

Ongoing community impacts from the very lengthy construction period needs consideration, along with the opportunities for employment generation and the wider labour and housing impacts.

While the proposed NW runway will have implications for the location of the Lakeside waste facility at Slough, the impact of securing an alternative location and new HGV movements to it needs consideration.

The scale of housing numbers and locations to create housing HMOs to house temporary Heathrow construction workers needs considering through the EIA scoping assessment.

More detail is needed on community compensation mechanisms, including governance, funding sources, and eligibility.

c. Proposed Consultation

CISHA and LPAs are correctly identified as key stakeholders.

d. Proposed Study area

Using the boundary of the DCO is too narrow given there are extensive community impacts from the DCO which requires mitigation and compensation.

Chapter 10 - Economics and Employment

a. Proposed Scope

The key guidance includes the economic chapter of the NPPF (2024) and the NNNPS recognising that transport acts as a driver of growth, on both the airport campus and in neighbouring areas.

The UK Industrial Strategy 2025 and its 8 growth drivers should be considered, as a Government strategy that has weight in planning matters (see NPPF paragraph 6). It is associated with other national policies as set out in the Plan for Change (Dec 24), the 10-year Infrastructure Strategy (June 2025) and the Get Britain Working White paper (Nov 24).

Heathrow is a known growth driver and drawn for HQ and other FDI investment and cluster development utilising the proximity of the airport. As a result, there is an opportunity to strengthen existing clusters in region. An employment land study should be undertaken.

The ANPS update is due in the next 12 months and can be expected to retain a focus on addressing economic gains.

The EIA records the London Plan 2021 as a key reference document. To which should be added adopted Local Plans from neighbouring Local Authorities.

In 2020, HSPG published an Economic Development Vision and Action Plan (EDVAP), an action-focused Plan to maximise the economic productivity, skills, jobs and business development in the HSPG area, through the prism of Heathrow airport economic activity, either current or with an eye on potential expansion. The EDVAP should be read alongside the action plan and evidence base. The EDVAP was a substantial piece of collaborative work, and the partnership is looking to renew and update this in the light of a new DCO coming forward.

In 2020 the HSPG also published a Joint Spatial Planning Framework (JSPF) for the sustainable development of the sub-region, to address the opportunities and implications of both 'baseline growth' and the additional growth demand forecast to result from the expansion of Heathrow Airport over the next 30 years. This responds to Government policy and the proposals of Heathrow Airport Limited, to construct a new Northwest Runway. The HSPG JSPF is also due for updating.

From Third Runway "Proposal to Government" it would appear that there is a lack of specific pledges about supporting local businesses and providing employment compared to the previous scheme (e.g. no reference to 10,000 apprenticeships or tackling youth unemployment).

Despite the downplaying of using a full TAG assessment in paragraph 10.4.2 a full TAG assessment is essential. The planning balance is a consideration of evidence and competing policy choices. The EA is a contribution to that debate and should be complete.

More detail is needed on community compensation mechanisms, including governance, funding sources, and eligibility.

b. Proposed Consultees

HSPG should be added into the list of consultees.

c. Proposed Data

Census and other data sets are the right set of proposed data.

Chapter 11 - Historic Environment

a. New legislation and guidance

The Levelling up and Regeneration Act 2023 has been enacted after the scheme was paused in 2020. The EIA scoping chapter 11 appears to address its new requirements on heritage.

b. Proposed Scope

The issues are largely local.

The EIA needs to consider the implications from local heritage plans in the study area and also assess the impact on Grade 1 listed buildings in particular and World Heritage sites.

Archaeology in and around Heathrow is significant and advice from English Heritage should be sought.

c. Proposed Consultation

Local Authorities should be added to the bodies consulted as they lead on Conservation areas, local listings and registered parks and gardens.

Chapter 12 - Health

a. Proposed Scope

The addition of the risks of aviation fuel storage health effects is sensible. Consideration needs to be given to the impact of the Governments policy approach of 'Health in all' policies. This includes consideration of the relationship between the proposed scheme and the achievement of 'Well-being'.

More detail is needed on community compensation mechanisms, including governance, funding sources, and eligibility.

b. Proposed Consultation

In 12.4.6 please change the reference to 'South Bucks Council', which has been replaced by its successor Council, Bucks Council.

Chapter 13 - Landscape and Visual Amenity

a. New legislation and guidance

The Levelling up and Regeneration Act was passed after the scheme paused in 2020. As a result the EIA scoping report needs to consider the impacts on the objectives of National Landscapes, such as the Chilterns, including in securing 'tranquillity' and 'dark skies'.

b. Proposed Scope

A Landscape Impact Study (LVIA) will be required to consider the expansion proposals.

The process needs to consider impact on the National Landscapes, such as the Chilterns and on registered national priority sites such as SACs, SSIs and Ramsar sites.

The London Mayor and Local Planning Authorities are currently undertaking a review of the London Green Belt. It is likely that this will lead to a release of land for development as 'Grey Belt', increasing the volume of new housing in locations within the zone impacted by development at Heathrow.

c. Proposed Consultation

Under Para 13.3 stakeholder engagement needs to include Bucks Council for National Landscape impacts.

Other Local Planning Authorities have an interest in SSSIs and Ramsar sites.

d. Proposed Study area

The EIA scoping report proposes (para 13.4.4) to reduce the study area to be reduced from 5km in the previous EA to 1km in new EA. This is too low and would miss the impacts on the National Landscape of the Chilterns.

Chapter 14 - Land Quality

a. New legislation and guidance

There is a need to take account of recent DEFRA led land use study as it emerges. It was consulted on in early 2025 and should be available in time for the period of the DCO examination.

b. Proposed Scope

The EIA scoping proposes consideration of contamination, quarry and mineral works along with minerals safeguarding which is appropriate.

c. Proposed Study area

There is some ambiguity over the fact that study areas for noise, land, air quality and transport etc extend beyond London boundaries, yet only London guidance is referenced in the addendum overlooking other regional guidance and policy when clearly for example transport will impact on a far larger study area.

Chapter 15 - Major Accidents and Disasters

a. New legislation and guidance

Two pieces of new legislation passed since 2020 when the scheme was paused includes the:

- Fire Safety Act 2021 (Royal Assent 29/04/21)
- Building Safety Act 2022 (Royal Assent 28/04/22)

This legislation will be critical for the design of the new buildings on the Heathrow campus and needs to be reviewed as part of the EIA scoping assessment.

b. Proposed Scope

There is a need to ensure there are resilient systems at Heathrow. This covers air traffic control, IT, airport and runway safety systems.

Resilience also covers water, sewage and electricity supply capacity, with appropriate backup systems being put in place and regularly tested.

The hazard scope appears narrow. It should explicitly consider: (i) aviation-fuel pipelines and storage – rupture, leak, fire, environmental contamination; (ii) mass-casualty transport incidents – including aircraft incident on- or off-site and mutual-aid for temporary mortuary capacity; (iii) terrorist / malicious-attack scenarios including MTA and insider threats; (iv) pandemic or biological hazards – lessons from COVID-19; (v) severe-weather impacts on power, access and passenger-management; (vi) critical-infrastructure dependencies (power, water, IT/telecoms) and the consequences of their loss during an emergency.

No reference is made to COMAH-regulated sites, the Pipeline Safety Regulations 1996 or off-site emergency plans for aviation-fuel infrastructure. These should be assessed for potential major-accident hazards and environmental consequences.

The report does not reference relevant aviation emergency-planning standards such as CAA CAP 168 and the Airports (Fire & Rescue Services) Regulations 1999, which underpin emergency preparedness and response at UK aerodromes.

Operational detail should include:

- Need for cross-border mutual-aid and surge capacity (e.g. mass-fatality arrangements, temporary mortuary contracts with partners such as Kenyon's, rest-centre and bottled-water provision for displaced passengers/residents).
- Explicit linkage to reservoir-breach modelling (Thames Water) and flood advisory groups.
- Need for traffic-management and emergency ingress/egress coordination with LRF static traffic plans and blue-light services.
- Reference to loss-of-utilities or industrial-action scenarios impacting safety-critical workforce and passenger welfare.

Consideration of drought related impacts on fire-fighting water supply and on bottled-water prioritisation for vulnerable residents versus airport demand – to be addressed with water-companies and fire service.

c. Proposed Consultation

The EIA scoping report addendum proposes that key stakeholders are both LPAs and HSPG which is supported.

d. Proposed Study area

The study area is proposed as 1km, the order limit boundary of DCO. This may not be sufficient to capture the area of risk of major accident and disasters and needs further consideration.

Chapter 16 - Noise

a) Proposed Scope and assessment *methodology*

The risk-based approach to the assessment of noise using LOAEL and SOAEL is welcomed but the definition of the UAEL needs further refinement and justification based on research for all sources air, ground and construction. For example, the Aviation Night Noise Effects (ANNE) study will be published in October 2025. ANNE was commissioned to examine the relationship between aviation noise and sleep disturbance and annoyance. It will be used by the DfT to inform future policies relating to night time aviation noise and exposure. It should also be used for setting targets and levels.

Noise contribution from aircraft using airports other than Heathrow (such as London City Airport) and the way these impacts should be scoped in.

TAG is not an impact assessment tool and there is a distinction between environmental impact assessment and environmental impact appraisal. *This should be acknowledged in the document.*

Full implementation of CAP1129: Noise Envelopes which goes beyond a simple numbers CAP solution.

The calculation of air noise in the original ES was predicated on future Indicative Flightpaths and operational patterns of use as then understood. This delivered on a number of key objectives for periods of predictable respite from overflights etc within the ANPS and previous Government decisions on introduction of Full Easterly Alternation and Night Flight Restrictions.

The scope should include a number reasonable scenarios generated the airspace changes which will be necessary for an expanded airport to operate. The ES should not devolve this matter to the airspace change process.

These Indicative Flightpaths and operational patterns will almost certainly change for the new periods to be assessed and so new patterns modelled and tested with full engagement and consultation on ensure these are representative of what is eventually adopted through other airspace processes. Factors to consider include:

- If the length or position of the runway were to change from the “at least” 3500m long North West Runway required in the 2018 ANPS masterplan then a new assessment will be needed as the nature of flight operations and noise effects will be different. For example, a shorter runway will be unable to accommodate all aircraft and therefore the stated objective of full runway alternation and ‘respite’ will not be possible – the entire schedule of operations for the whole airport (three runways) will need to be re-modelled. If the location of the new runway ends change then inevitably all noise modelling will need to be calculated for the new runway. A reasonable spread of scenarios will be required for aircraft fleet types and additional operating restrictions imposed in a range of different weather conditions.

- Indicative flightpath modelling scenarios should reflect likely changes in flightpaths to Heathrow and interaction with those to other London airports as a result of London TMA Airspace Modernisation Strategy (with effect from late 2020's). Also the likely changes in destinations served (and therefore approach and departure routes) reflecting both growth in air traffic movements and the impact of new competition with expanded capacity at other London airports (City, Gatwick, Luton and Stansted) and with respect to Heathrow's 'hub' role, European and Manchester hub airport.
- Furthermore, rapid development of Advanced Air Mobility including eVTOL and more advanced STOL aircraft are likely to be in use in the London TMA by 2035-40 when the new Runway first comes into operation – more so by 2054 end state. The direct impact of these aircraft in the Study Area should be modelled with appropriate range of scenarios. Further questions should be asked around any indirect effects these new operations have in imposing additional restrictions on conventional operations at lower levels of airspace in approach / departure to Heathrow. e.g. By what route will eVTOL passenger or freight aircraft access the Heathrow 'campus' (including new landing and take-off locations a little beyond the existing aerodrome perimeter)? What scale of activity?

b) Proposed study area

The study area for noise appears to be satisfactory.

Nighttime

After 2028 a new Nighttime Policy regime will be in play, informed by new evidence referred above – the ES will need to take account of changes on Government Policy on flight operations.

c) Proposed Data

Assessment Methods

Changes are anticipated within the next 24 months in the noise standards, levels, limits and assessment methods for aircraft noise impacts. This includes new evidence commissioned by DfT/CAA on the impact on populations and individuals with the long-awaited Aviation Night Noise Effects (ANEE) study and updated Survey of Noise Attitudes (SONA) study. These may lead to changes in policy, noise threshold levels but critically also assessment methods and scoping. Scoping (para 1.3.1 on baseline information refers).

Use of UAEL – working down from unacceptable level of noise, rather than relating to SOAEL and LOAEL is without basis in existing policy guidance.

It would be helpful for HAL to confirm how emerging studies (e.g. ANEE, SONA) will be integrated into the ES methodology.

Clarity is required as to the level of ATM eventually proposed and assessed and the phasing of growth. In particular, the previous proposals included a short period of

‘early growth’ with use of two-runways. Is any such ‘early growth’ proposed or in scope?

It is not clear which years will be used for baseline or future baseline. 2023 is mentioned but may not be representative. Comparisons between a 2016 and 2023 baseline should be avoided because they may be misleading. Interpretation of The ICAO policy on aircraft noise the Balanced Approach to Aircraft Noise Management should be followed. Choice of Baseline should facilitate sharing future benefits and not emphasise historic improvements in aircraft noise mitigation at source which may have contributed to the reducing noise contour areas.

Chapter 17 - Traffic and Transport

a. New Legislation and Guidance

The EIA scoping report refers to the National Network National Policy Statement (March 2024) and updates to the guidance from IEMA and the Highways Agency amongst others.

Since the scheme was paused in 2020 a key new piece of legislation that has been adopted is the Air Traffic Management and Unmanned Aircraft Act 2021 (Royal Assent 29/04/21).

The Department for Transport has recently published its new Quantifiable Carbon Guidance (QCG) in 2025, setting out how local transport authorities should prepare and use carbon analysis to inform transport strategies and schemes.

To support this process, the Carbon Assessment Playbook (CAP) has been developed jointly by the Sub-national Transport Bodies (STBs). It provides:

- Carbon baseline dashboards for each local transport authority, showing how emissions are forecast to change over time.
- A policy builder that enables users to assess the potential carbon reduction impact of different interventions

As noted above, Heathrow should have regard to this guidance in assessing carbon impacts of surface access.

b. Proposed Scope

The scope of the assessment should consider impacts on the M25, the other motorways to the west of London and the strategic highways in the study area.

The assessment should take account of:

- Regional and local policies from all affected authorities on transport
- Mayor of London’s Transport Strategy (and daughter documents including Vision Zero action plan) and other Local Transport Plan modal shift targets.
- Local walking and cycling implementation plans (LCWIPS)
- Bus Service Improvement Plans (BSIPs)
- Parking strategies pursued by Councils for the surrounding area.

- The impact of a southern road tunnel needs specific detailed consideration and evaluation as a major change to local highway connectivity
- Disability issues in access proposals.
- Road safety implications of proposals
- The impact of the opening of the Elizabeth Line.
- The impact of public transport options for improved rail, underground, bus and coach connectivity on the sustainability of the proposals.

A particular concern of local highway authorities is the issue of displacement, either temporary or permanent, of traffic flows from the strategic road network to the local network. It will be essential that the approach to modelling adopted is sufficiently sensitive and robust to pick up material challenges on local roads. This will be an important part of the validation process for the transport modelling.

A further consideration will be the asset maintenance impacts of very significant increases in HGVs (from construction and BAU), alongside heavier cars more generally with a shift to electric vehicles.

If the length of the runway were to change from being a long to a short runway a new EIA will be needed as transport and traffic effects from a shorter runway will be wholly different.

From Third Runway “Proposal to Government” it is not clear whether there is still a commitment to the development of western and southern rail schemes as an integrated part of the scheme. Early clarification is sought.

If the western and southern rail schemes are pursued in order to secure modal shift, they are likely to act as a growth and investment driver. They need to be taken into account given their in-combination impacts, particular the potential for combined delivery and operation of western and southern rail access proposals.

From Third Runway “Proposal to Government” it is unclear whether the previous ‘No more traffic’ pledge is now being dropped and whether the scale of parking may expand. This needs to be picked up in EIA assessment as this is different to the previous EIA.

The EIA should consider impact of a hypothecated funding mechanism to support sustainable transport investment over a longer time period, as has been secured at many other UK airports including via the Gatwick and Luton DCOs.

Finally, the construction period is an important phase and needs setting out on its own terms, it must not lead to minimise the impact on local communities in terms of traffic congestion, noise and pollution challenges.

c. Proposed Consultation

The document proposes consultees including the HSPG, LPAs and transport bodies, such as Transport of the South East, counties in 2-tier authorities, Network Rail, National Highways, transport operators, TfL. This is welcome.

d. Proposed data

Baseline data needs to be consistent, with a baseline of 2024 being considered reasonable and needs to provide a common input to all models. We should seek for this to be fully TAG compliant. In some instances, it is likely that models will not be fully validated in advance of the statutory consultation, so we need to push for appropriate interim models and data needs to reflect such an approach.

There should be a particular emphasis on car parking data so that the proposed increases in parking provision can be fully assessed

Robust data needs to be used to assess the impact of the proposed Southern Road Tunnel in particular, as this is likely to have a significant impact on movement patterns if unfettered access for private car journeys is facilitated.

e. Proposed Study Area

Baseline information needs to be updated to inform the new TA.

Changes to the baseline will occur as the H8 business plan projects are implemented.

There is some ambiguity over the fact that study areas for noise, land, air quality and transport etc extend beyond London boundaries, yet only London guidance is referenced in the addendum overlooking other regional guidance and policy when clearly the transport network will be impacted across a far larger study area.

Following on from data comment above, the study area needs to fully encompass the area where traffic patterns are impacted by the potential opening up of a Southern Road Tunnel.

Chapter 18 - Water Environment

a. New legislation and guidance

The EIA scoping paper identifies the need to take account of the policy context set by the ANPS, the NPPF and NNNPS.

b. Proposed Scope

It is critical to consider the flood risks in reviewing the potential impacts of climate change, including surface water and run off impacts.

There is a need to consider the potential impact of proposals on the River Colne and Crane, the Thames Water reservoirs and RAMSAR sites on the western edge of Heathrow.

The Third Runway "Proposal to Government" is unclear what is proposed for green and blue infrastructure. In 2018 there were detailed issues of concern by HSPG members including mitigation for loss of green and blue infrastructure (particularly habitat impacts from river culverting) and issues caused by relocated land uses

(Lakeside Energy from Waste centre, Immigration Removal Centre, BA's Waterside HQ etc).

The EIA should address the impact of Thames River Basin District River Management Plan.

c. Proposed Data

Changes to baselines will arise from the implementation of the H8 business plan.

Chapter 19 - Cumulative Effects Assessment

a. Proposed Scope

There is a need to consider the cumulative and combined effects of expansions at City, Gatwick, Luton and Stansted alongside the proposed expansion of Heathrow. These in combination effects will impact on airspace, climate change carbon limits, interaction of demand and the need for a spread of scenarios for rates and levels of growth. All of which needs scrutiny and testing.

There is a need to consider the relationship to the H8 business plan.

There is also a need to consider the relationship to Local Plan enabled growth, especially with planned residential growth within the study area, but planned areas of new economic growth too.

A critical judgement is assessing the resilience of the surrounding local community to the in-combination effects of both Heathrow's growth and planned local growth.

From the HAL report Third Runway "Proposal to Government" there is no reference to 'Green Controlled Growth' or similar which was proposed in the earlier scheme, a means to avoid growth exceeding identified metrics used for monitoring

It is important to capture in combination effects

- Easterly Alternation
- Airspace Modernisation Strategy and associated change in the use of airspace
- West London Waste Plan

b. Proposed Data

The baseline is ambiguous.

c. Proposed Study area

Needs to be the cumulative impacts of the different policy themes and the DCO expansion and the H8 business plan proposals acting together.

Conclusion

Local Authorities, supported by HSPG, look forward to working with PINS and the applicant to work through the issues raised and to engage collectively and collaboratively in the next stage of drawing together the EA.

Yours faithfully,



Mark Frost, Associate Director Heathrow Strategic Planning Group
On Behalf of HSPG members¹

¹ Full Members of the HSPG (and signatories of an 'Accord') are: Elmbridge Borough Council, London Borough of Ealing, London Borough of Hounslow, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council, Royal Borough of Windsor & Maidenhead.

Appendix 1 – HSPG Outcomes Statement

OUTCOMES FRAMEWORK – DRAFT FINAL

July 2025

Introduction

This statement sets out the outcomes that the members of the HSPG agree should be secured in respect of the operation of Heathrow airport to maximise benefits and minimise adverse impacts for the HSPG area. It specifically addresses changes at, or the expansion of, the airport but does not adopt or imply a position on their merits nor fetter the discretion of each HSPG member authority to adopt their own position on changes, including expansion, at Heathrow.

The statement is intended to also provide the basis for further collaboration with Government, the airport operator and others, on:

- *Supporting the catalytic impacts of the airport for delivering economic growth locally and nationally*
- *Help guide the revision of the HSPG Joint Spatial Planning Framework (JSPF) to provide a clear statement of the land use planning implications of change at the airport*
- *A new prospectus for economic development in the area which updates and expands the existing Economic Development Vision C Action Plan (EDVAP) and fully explores the opportunity for increasing inward investment into the region*
- *The development of an infrastructure and investment statement which identifies the requirements for the HSPG area and how they can be funded, including the scope for a sub-regional sustainable growth fund.*

The statement seeks a new compact between HSPG members and the airport; including a comprehensive and integrated approach to managing and funding the range of compensation and mitigation measures that would be required if there is an increase in airport operations.

Accordingly, it will steer the work that is undertaken through HSPG on three levels of development and potential development at the airport:

- (a) *The existing airport campus footprint: addressing requirements for operation of the current two runway airport and the latest policy on airport operations and airport related development.*
- (b) *Development of the existing campus: addressing requirements for the operation of a two-runway airport with redevelopment of the existing terminals and other measures to allow growth in operations. This would reflect significant growth in passengers and cargo and in other airport related activities, including the demand across the sub-region for employment land.*

- (c) *Expansion: addressing requirements for a three-runway airport and exponential change in the scale and nature of airport operations.*

Most of the outcomes set out below will need to be considered spatially, on two geographical levels:

- (a) *The Heathrow ‘campus’ – land, buildings and associated development related to the airport, including the area comprised within a Development Consent Order or other planning application required for airport campus development*
- (b) *The wider ‘area of influence’ subject to growth directly and indirectly impacted by changes at Heathrow including expansion and over which Member organisations have a Local Plan making role and on which new spatial plans will apply*

The outcomes framework reflects recent and anticipated changes in law and policy, nationally, including in national planning policy statements, and locally and will guide the HSPG input and responses to:

- *The development of an initial proposal by HAL or other potential developers for expansion to be submitted to Government by summer 2025*
- *Any revision of the Airports National Policy Statement (ANPS)*
- *The development of strategic spatial plans by new combined authorities.*
- *Any revision by the CAA of the economic regulation regime for Heathrow*
- *Any pre-application, Development Consent or other planning processes including submission of a compliant planning application*
- *Enabling works and main construction phase for any consented works*
- *The future operation and development of the airport in line with the revised ANPS.*

As well as:

- *the London Plan particularly as regards land uses and development sites*
- *implementation of the London Growth Plan including West Tech London*
- *Government’s industrial strategy.*

The following sections sets out the detail of the outcomes sought, in five themes:

- *Place Making*
- *Infrastructure and Networks*
- *Net Zero*
- *Health C Wellbeing*
- *Economic C Social*

Place Making

Pattern of Development

Capitalise on the airport and the unique identity of the area as a catalyst for economic development, regeneration and inward investment to support a sustainably planned network of complementary urban and economic centres characterised by high quality placemaking - locating the right development in the right place.

Development Sites

Agree the priority opportunities for collaboration with the airport on infrastructure enhancements and broader place making activity with a focus on intensification sites, growth corridors, and town centre schemes.

Specifically, identify opportunities arising from re-purposing of existing development on or near the airport campus, such as hotels, freight or logistics sites, for nearby town centres and identified intensification sites.

Land Uses

Employment land, particularly unconstrained land, to be safeguarded to provide for the growth of aviation-related industrial development, for wider job-creating employment developments and for necessary supporting infrastructure -particularly in priority sectors, growth corridors and business and service clusters.

Employment land necessary (a) for growth or expansion of the airport, (b) to meet additional induced demand associated with growth or expansion and (c) to replace existing employment floorspace that is displaced, to be clearly identified along with related development and infrastructure including surface transport investment.

A strategic approach to CPO and land use swaps that supports the achievement of outcomes being sought for employment and other land.

Habitat

Designated sites for nature conservation are protected and enhanced within an Environment Delivery Plan which sets out obligations on the developer for their maintenance and management or for offsetting and compensating measures. These obligations should reflect the views of local stakeholders and are to be fully funded either directly or through an associated levy.

All proposals for changes on the airport campus should deliver biodiversity net gain and any biodiversity credits should be used in the HSPG area to contribute directly to positive outcomes.

Negative impacts arising from ineffective management, resulting in insufficient protection of wildlife, displacement of local communities, economic disadvantage, and/or unintended ecological consequences and impacts on tranquillity, should be avoided for all designated landscapes, including the relevant Special Areas of Conservation.

Flood risk

No increase in flood risk. Minimise disruptive impact on waterway systems and water levels and provide additional water storage capacity for run off, including through blue and green infrastructure. Ensure effective engagement and collaboration with the River Thames Scheme DCO.

Heritage

Conserve and enhance the significance of designated and non-designated heritage assets, including any contribution made by their settings in accordance with statutory requirements.

The significance of heritage assets and wider historic environment to be conserved and enhanced and opportunities taken to investigate, better understand, enhance and celebrate local assets, including encouraging tourism to the area.

Increased Operations (including expansion)

Specific strategies for the protection of designated assets in locations which are significantly impacted by new development.

Landscape and Design

A landscape and place led approach towards high quality design for new development on the campus that both reflects the status of a major international hub airport and respects and responds to the setting of the surrounding local design context and character, taking opportunities to enhance any features or qualities that contribute to character. and is shaped through collaboration with local communities.

Protection and enhancement to visual amenity of the surrounding areas through a holistic approach to mitigation, which is landscape led, and is based on a clear landscape strategy, which includes a package of site-specific and wider mitigation and enhancement measures, including where impacting the setting of surrounding public open spaces, green belt and National Landscapes.

A coherent strategy to enhance connections and minimise severance between surrounding areas and the airport campus, integrating and enhancing walking and cycling links, ensuring places are easy and pleasant to get to and through and are easy to understand and navigate.

Infrastructure and Networks

Transport

A transport plan to address increases in airport operations and a vision-led transport statement or transport assessment against which the impacts can be assessed and monitored including for the purposes of specifying a controlled growth regime.

Promote the airport as an integrated surface transport hub to be an exemplar interchange facility providing seamless travel options for the HSPG area through the development of a comprehensive coach strategy, full delivery of an ambitious Bus Service Improvement Plan (BSIP) and Local Cycling Walking Infrastructure Plan (LCWIP).

Specifically:

Surface access commitments reflecting ambitious mode share targets for passenger and employee travel, and a minimum percentage of specific types of journeys (particularly drop-off and pick-up journeys). The starting point for such targets should be to avoid any increase in traffic and to respect the cap on T5 parking numbers.

Required measures for achieving targets, defining some specific sticks (how to deter car usage) and the carrots (enhancing public transport and active travel). The measures to include:

- *Enhanced rail links: Delivering Southern Rail access and the Western Rail Link. Improvements to Piccadilly line capacity and reliability.*
- *Southern road tunnel: Providing bus and cycle-first access to the Central Terminal Area from the south.*
- *Demand management: Progressive parking and drop off charge policies that help incentivise use of sustainable modes and cleaner vehicles.*
- *Direct public transport connectivity between Heathrow and the HS2 station at Old Oak Common.*

Obligations for HAL to address possible consequential or displacement effects e.g. making sure that the on-site parking and drop off regime does not lead to an increase in off-site parking and waiting. This may include the development of a comprehensive “Airport Parking Zone” where the use of the local highway network by airport users is actively restricted and controlled.

Stringent controls on the traffic impacts of the construction phase developed in partnership with Local Highway Authorities to minimise impacts on local communities and mitigate the residual effects. These controls should include provisions to monitor and to minimise air quality impacts including through construction vehicle route planning.

Establishment of a Sustainable Transport Fund (STF) to invest in measures around the airport campus that support mode share targets. This should be funded through a levy

on income from parking and drop-off charges, jointly managed by the airport and impacted neighbouring local authorities.

Increased Operations (including Expansion)

Controlled growth regime to ensure that mode share and other targets are met, with binding restrictions on intensity of airport operations if not.

Energy

Action taken at the systems level (transmission and distribution) to deliver timely and appropriate increases in power into the sub-region to support ambitious decarbonisation and growth plans across local authorities and businesses in and around West London. This infrastructure needs to be sufficient to accommodate the demand forecasts in the relevant Local Area Energy Plans and the additional requirements associated with the energy transition and an increase in operations at Heathrow.

Adequate provision made in relevant investment plans (National Grid and SSE) to provide the cumulative additional supply via high voltage transmission needed by constrained Grid Supply Points in and around West London. Given current and forecast constraints this is likely to require significant acceleration of planned projects.

Actions to address recovery and resilience issues for the networks in the HSPG area addressing the lessons learned from North Hyde GSP fire.

Other measures to enhance local power generation, storage and distribution including infrastructure for local solar power generation, grid feed-in and storage and a more systematic approach to utilising surplus heat from Data Processing Centres.

Digital Connectivity

Opportunities for enhanced and resilient connectivity, including delivery of further spine infrastructure, maximised for the benefit of the broader HSPG area.

Green and Blue infrastructure

Infrastructure should be developed to enhance green and blue assets as a strategic network for multi-functional uses supporting more abundant, high quality and well-connected assets which are well managed and maintained and which also provide capacity for flood water alleviation.

A specific strategy for the maintenance and enhancement of the Colne Valley Park and Crane Valley Corridor which respects the connectivity and function of the rivers and waterbodies of these areas, including consideration of re-opening culverted rivers where appropriate.

Improve public access to the countryside and to local opportunities for sport and recreation.

Minimise land take from green space or, where there are exceptional circumstances, Green Belt and compensate and mitigate any losses or harm.

Support the development of the West London Regional Park.

Net Zero

Strengthen the interfaces between local authority commitments to Net Zero and Heathrow's obligations to reduce and eliminate carbon emissions including:

- *Full and timely information exchange between Heathrow and local authorities on current and future Scope 1, 2 and 3 emissions (including relevant airline emissions), their potential impact on relevant targets and the need for additional action to be taken.*
- *A collaborative approach to local production of Sustainable Aviation Fuel via LA waste streams*
- *A collaborative approach on plans for hydrogen fuels so that these support both aviation and local users (HGVs etc). This should include the power supply necessary for liquification of hydrogen so that it does not adversely impact wider development activity*
- *Support beneficial uses of surplus heat from airport operations for local heat networks and low carbon energy systems.*

Commitments to being an exemplar in the development and implementation of science-based reductions to minimise Scope 3 emissions. Where it is not possible to further reduce emissions (rather than to create headroom to allow future increases in emissions arising from additional activity at the airport), a defined approach to offsetting residual emissions moving towards a joint position on high integrity 'insetting' which achieves significant additionality to focus on changes in the HSPG area itself such as:

- *agreement that HAL will buy any local renewable energy supply and an associated stimulus package*
- *commitment to dovetailing noise insulation with carbon and energy reduction retrofit.*
- *Proactive work to develop a Local Carbon Offset market of local decarbonisation opportunities*

Critical infrastructure changes to achieve net zero as set out in other sections of this statement particularly on upgrades to sustainable transport modes and energy grid upgrades to deliver electrification.

Increased Operations (including expansion)

GHG Emissions Controlled Growth

A controlled growth regime covering GHG emissions from (a) general airport operations, (b) surface access and (c) airport related development so that progressively tighter limits are set for different stages of growth up to full capacity. These limits would be reviewed to achieve the requirements for a 2040 Zero Emissions Airport and Jet Zero targets.

The expectation is that limits would be set for:

- *Scope 1 and Scope 2 GHG emissions to include generation of consumed electricity; combustion of consumed gas, vehicle fuel, electricity generation for EV; de-icing.*
- *Scope 3 to include third party consumption of electricity, fuel, aircraft engine tests, aircraft taxiing, processing of waste and surface access.*

The expectation is that a controlled growth regime would cover gross Scope 1 and Scope 2 emissions (i.e. with no offsetting) and net Scope 3 emissions (allowing offsetting where emission reduction is not possible).

Health and Wellbeing

Wellbeing

Prioritise interventions which will help to boost median incomes for households across the HSPG area, enhance amenity, particularly the availability and quality of open space, and minimise the adverse impacts of airport operations on health, particularly for those residents most directly affected by environmental impacts from airport and airline operations.

Noise

Current Operations

- *Predictable respite for all affected communities through alternation of the two runways in single-mode operational use by day. The use of runways for multi-mode operations should be prohibited in anything but defined special or exceptional emergency circumstances.*
- *Rapid phasing out of all scheduled flights in the period 04.30-06.00 with reallocation of these slots prioritised in the daytime period.*

All other scheduled night flights should also be phased out and reallocated to the daytime period, unless the case for their continuation is clearly demonstrated through a collaborative assessment with stakeholders reflecting the balance of operational requirements, economic benefits and noise impacts.

- *Further measures to deliver benefits for the most significantly impacted populations nearest the departure and arrival routes (e.g. airspace design and air traffic movements, predictable respite, runway alternation, ground noise controls, procedures for steeper departures and descent etc).*
- *Further measures to deliver benefits for other communities with observed noise impact and those that are overflown e.g. design of airspace and air traffic movements, quieter planes and their treatment within the nighttime quota, alternation of a spread of Performance Based Navigation flightpaths to avoid concentration and 'noise sewers', support for Quiet and Green track monitoring with clear and enforceable consequences for infringing airlines).*
- *Commitments to examine additional operational changes to further reduce disturbance including continuous periods of at least 7 hours respite for all communities each night in the period 22.00 to 7.00 and the timing and duration of alternation and flightpath related respite periods.*
- *Transparent enforcement regime, including scrutiny of monitoring data, through an organisation independent of both the CAA and HAL.*
- *Mitigation measures including a noise insulation programme plus a community compensation package for residential and other sensitive uses (buildings and open areas), with associated regular reporting. Eligibility for existing and new premises. This should include an accelerated programme to invest in the 2024 Quieter Neighbourhood Support scheme for 100% cost of*

insulations to 20,000 homes and other sensitive buildings, and to compensate public open spaces.

Increased Operations (including expansion)

- *Noise envelope for all operations which is managed through a controlled growth regime to ensure noise targets (including compensation and enhanced insulation programmes) are delivered before further increases in ATM.*
- *Further runway and flightpath alternation and respite mechanisms so that as a minimum there is no increase in the most significantly affected population and no additional impact for other communities which have an observed noise impact.*
- *A package of enhanced noise insulation measures for populations that are newly affected or overflowed which is at least as good as the existing Quieter Neighbourhood Scheme.*

Air Quality

Development and implementation of an ambitious air quality strategy which addresses emission from airport operations defined as (a) surface access, (b) aircraft engine ground running and testing, (c) airside vehicles, (d) energy and fixed plant, (e) other defined sources. The strategy should also include provisions for the assessment of emerging categories of emission for which reduction and mitigation measures may be required, such as ultra fine particulates.

Development and implementation of an Air Quality Action Plan agreed with local stakeholders for the construction phase.

Compliance with National Air Quality Objectives with periodic reviews of pollution levels, a binding requirement to assess the cause of any exceedances and for the airport to take action to reduce concentrations where these arise from airport operations.

Introduction of credible interventions that can be scaled e.g. enhanced airport Clean Air Zone and/or Zero Emission Zones.

Progressive reductions in concentration levels of pollutants to improve air quality, including in areas which are below relevant thresholds (reflecting limits or targets that have been set by local or regional enforcement bodies).

Water Quality

Quality of surface and ground waters protected including measures to control surface water run off

Safeguarding for Future Delivery of Advanced Air Mobility (AAM)

Licensing regime to reflect agreed use cases for the operation of vertical take-off and landing (VTOL) craft in and around the airport. These use cases must reflect the level of societal acceptance of impacts, particularly intrusion relating to noise, surveillance and amenity which will vary between use cases and environmental and health impacts, including on air quality.

A coherent strategy for the use of low-level airspace (below 4,000 feet) around the airport expressed through an airspace design using routes that minimise intrusion and reflect Local Transport Authority input (particularly relating to multi modal access to the airport, existing access corridors and the siting of take-off and landing points).

Power supply requirements of increased use of advanced air mobility craft fully assessed and factored into future energy planning scenarios.

Implications of Airspace Usage for Land Use Planning

Timely and transparent information exchange, including with the CAA in respect of licensing decisions particularly for AAM, allowing local planning to proceed with confidence, including new AAM facilities.

Economic and Social

Priority Sectors

Collaborate on opportunities to strengthen priority business sectors which benefit from proximity to the airport, including those which have been identified as national or regional priorities, particularly where there are schemes to facilitate their further development such as growth corridors and support for innovation.

Employment

Maximise direct employment opportunities, training opportunities and apprenticeships for residents reflecting a strategy developed in collaboration with relevant local stakeholders; and extend the range of indirect employment opportunities in the wider airport ecosystem which are made available through initiatives such as the Heathrow Academy. Work to further objectives in Local Economic Strategies.

Skills

Increase employment and promote opportunity for residents through the careers and skills opportunities to be created through an increase in operations and any expansion at the airport. Work to further objectives in Local Skills Improvement Plans.

Supply Chain

Maximise the opportunities within the supply chain, with a particular focus on supporting SMEs, particularly in developing the skills needed to meet procurement requirements. This should begin with the construction phase when associated with growth or expansion of the airport.

Maximise the scope for collaboration to support net zero in airport or airline operations, particularly through supply chains in the area which could build on the existing Lift Off programme.

Research and Development

Develop existing and new research collaborations between the airport and local HE and other institutions and the scope for technology transfer and diffusion.

Leverage support and funding from central Government budgets for innovation, including in the green economy, particularly in the context of implementation of the Government's industrial strategy

Inward Investment

Capitalise on the airport as a catalyst for inward investment, supporting more businesses to locate in major employment sites across the HSPG area.

Develop place branding, such as a Heathrow Economic Zone, reflecting best practice from elsewhere focused on the unique identity of the wider area characterised by the relationship with Heathrow and the role of the airport as an arrival 'shop window' that celebrates the local, regional and national economy and inspires investors. This should be developed through collaboration with a wide range of stakeholders including London and Partners, WLA, WLB, strategic authorities and chambers of commerce.

Develop the airport's landside offer as a location for business-to-business meetings.

Cargo

Collaboration with the airport on the implications of changes in cargo volumes and the development of freight and logistics operations at the airport for:

- *employment land and industrial space across the HSPG area, particularly the siting of distribution centres*
- *The traffic movements associated with these operations and their implications, particularly the degree to which they may constrain the scope for other employment and housing developments in the HSPG area.*

Collaboration on decarbonising the logistics sector.

Housing and Social Infrastructure

Identify the implications for the local and wider housing market and social infrastructure (including schools and health sector) of new jobs associated with the airport and related development, including travel to work implications. This should be analysed through a study specification agreed with HSPG including the impacts on the objectively assessed need for housing and employment land and across all sectors of housing including market, private rented sector and affordable housing, over all the phases of growth and the scope for the developer to contribute directly to enhancing the available supply through providing dedicated employment related accommodation.

Development of a joint strategy to address distortions to local housing markets. e.g. Programme of Article 4 Directions to manage the conversion of family houses to HMO.

Housing for construction workers sited in the most sustainable locations in respect of direct environmental impacts, accessibility to areas of construction, and opportunities to re-use empty or new homes.

Compensation and Mitigation

A comprehensive and integrated scheme for compensation and mitigation which is proportionate in scale to the impact of change and expansion at the airport.

Such a scheme should commence with the construction phase and would continue into the operational phase ensuring that there are funds available to meet the ongoing impacts of airport and airline operations.

The scheme would be set out in a new compact agreed between the airport and local authorities which would establish joint governance arrangements and agree the contributions to be made from various sources of funding.

The scheme should, for example, include provision for:

- *fair compensation to residents whose homes will be compulsorily acquired*
- *mitigation measures for health, community facilities, public realm enhancements and support for training and skills.*
- *mitigation measures for noise related impacts, including a noise insulation programme and a compensation package for residential and other sensitive uses (buildings and open areas).*
- *A sustainable transport fund to cover mitigation measures for local impacts and to achieve secure mode split targets*
- *Agreements with the airport operator to support local authority activity to give effect to other provisions in the outcomes statement such as those relating to net zero and energy*

It would also identify funding sources for these measures including, for example:

- *direct contributions agreed as requirements of planning permission*
- *passenger levies.*
- *a top slice on parking/drop off fees.*
- *enhanced business rate retention and a more proportionate distribution of funding across impacted authorities.*

Investment or funding required to address trigger mechanisms within environmentally controlled growth regimes would be determined in accordance with the relevant provisions established in planning consent or related documents.

