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SCOPE OF INFORMATION TO BE INCLUDED WITHIN
ENVIRONMENTAL STATEMENT REGULATION 15(1) OF THE
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL
IMPACT ASSESSMENT) REGULATIONS 2017

EASTERLY ALTERNATION INFRASTRUCTURE PROJECT
ENABLING WORKS TO FACILITATE THE ENDING OF THE
CRANFORD AGREEMENT
HEATHROW AIRPORT

REF: 41573/APP/2023/3159

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1. General Comments

- 1.1. This scoping opinion has been prepared on the basis of the information contained within the Scoping Report (the 'Report') submitted by Heathrow Airport Limited (HAL) dated November 2023.
- 1.2. The scoping stage for the environmental statement (ES) is a valuable tool in helping the applicant to form an agreement with the Local Planning Authority (LPA) about how environmental data will be collected and used and to remove possible conflict once a planning application is submitted.
- 1.3. The ES is an assessment of the environmental effects of a proposal which are caused by the development's 'impacts' on 'receptors'. The scoping stage allows an agreed approach to identify a baseline environmental position against which effects will be assessed as well as setting out a methodology for identifying impacts and receptors.
- 1.4. To ensure that the ES is appropriately applied to the development the comments below are accompanied by a series of recommendations which fall into two categories. Firstly, there is clarification of the topics to be scoped in or out of the and secondly, suggestions about further work have also been provided. Some of these suggestions are to prompt further discussions prior to the ES being undertaken. These relate to a variety of topics but largely to areas where there are different views or that seek clarification of matters that are fundamental to the assessment process.

2. Summary

Broad Topic	HAL Position	LBH Position
Air Quality	Scoped In	Agreed
Noise	Scoped In	Agreed
People and Communities	Scoped In	Agreed
Health	Scoped In	Agreed
Historic Environment	Scoped In	Scoped Out

Landscape and Visual	Scoped In	Scoped Out
Biodiversity	Scoped In	Agreed
Land Quality	Scoped Out	Agreed
Major Accidents and Disasters	Scoped Out	Agreed
Traffic and Transport	Scoped Out	Agreed
Waste Management	Scoped Out	Agreed
Vortex Damage	Scoped Out	Agreed
Greenhouse Gas and Climate Change	Scoped Out	Agreed
Hydrology and Hydrogeology	Scoped Out	Agreed

- 2.1. Some of the broad topics have been further refined to exclude or include specific matters. The detailed commentary in this Scoping Opinion sets out the position in relation to these.
- 2.2. Scoped out topic areas does not translate to an opinion that there will be no resulting impacts or effects. It is simply a conclusion on the significance in the context of the EIA Regulations. A scoped out topic may still give rise to impacts that could be positive or negative and will require appropriate treatment as part of a subsequent planning submission as with any other material planning considerations.

3. Consultation Responses

A number of consultation responses have been received and these are attached as appendices.

4. Scoping Procedure

- 4.1. Regulation 15(1) allows the LPA to provide an opinion on what a subsequent ES should

contain and consider. Regulation 18(4) provides the status of the opinion in the subsequent development of the ES:

where a scoping opinion or direction has been issued in accordance with regulation 15 or 16, [an ES must] be based on the most recent scoping opinion or direction issued (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion or direction)

4.2. Consequently, the Scoping Opinion issued by the LPA becomes a determining factor of what the ES should contain although this falls short of 'binding' the applicant. In turn, Regulation 15(4) does not bind the LPA to its Scoping Opinion particularly if previously unconsidered likely significant effects arise during the subsequent development of the planning submission.

4.3. Consequently, the LPA will continue to work with the Applicant through the development of any subsequent submission to ensure likely significant environmental effects are properly assessed.

5. Planning History

5.1. The LPA has reviewed an application for the enabling works to end the Cranford Agreement previously. The 2013 submission (41573/APP/2013/1288) (the 'previous submission') was accompanied by an ES in accordance with the 2011 EIA Regulations. This submission forms a useful and informative point of reference for considering this latest scoping request for the updated ES. It is acknowledged that in some instances the baseline would have altered to the extent the previous assessment is no longer valid, however, for some environmental topics this is not the case. Commentary is provided in the context of this previous assessment where appropriate.

6. Baseline

6.1. The baseline is a key part of the ES and recognised in Schedule 4(3) as needing to be clearly set out:

A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline

scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

- 6.2. The key assumptions in the Report are generally agreed except where specified elsewhere in this Opinion.
- 6.3. It is noted that in the previous submission that inconsistencies in the use of air traffic movements (ATM) were used, particular with regards to air quality. Heathrow operates within an ATM cap of 480,000 set through the Terminal 5 decision. In 6.3.19 of this report there is an implication that a lower level than the existing cap will be used:

To facilitate assessment, future baseline conditions will be established for air and ground noise. A single future baseline year will be considered which will reflect opening year. This will assume that the airport has fully recovered from the impact of Covid-19 and is operating towards its permitted ATM cap of 480,000.

- 6.4. For avoidance of doubt, the reasonable worst case scenario should result in the future forecast utilising the permitted cap of 480,000 ATMs. This is regardless of previous trends of not reaching the specific cap and also noting that there are additional movements outside the cap.

1 480,000 ATMs should be the threshold for all the relevant assessments.

Future Baseline

- 6.5. The Regulations require the ES to consider, where reasonably possible, the evolution of the baseline without the development. This allows a comparative exercise to be undertaken to compare the 'with' and 'without' development scenario over a longer period of time. However, the Report identifies a solitary future year as the point of assessment and presents no forecasting baseline beyond the opening year:

Future baseline (without the Proposed Development) – this would be the opening year of the development. No further assessment years are required since the environmental effects associated with the proposals would get no worse and in actual fact are likely to reduce over time as aircraft become cleaner and quieter. As a result, the opening year is considered to be the worst-case year as regards environmental effects. (4.9.2)

- 6.6. Limiting the assessment year to a single baseline period is likely to generate concerns. Whilst there is general acceptance that aircraft may become cleaner and quieter, the evidence to support this assertion needs to be provided.

- 6.7. The airport is unlikely to look the same in 2033 (5 years after commencement of operation) even allowing for the business as usual model. Whilst there is a cap on ATMs, there isn't on passenger numbers or types of aircraft. The fleet makeup is therefore very important with assumptions made around 2028 needing to be explicitly laid out and a future baseline year should be 'tested' appropriately.
- 6.8. In particular, the impacts on air quality will be inherently linked to passenger numbers and wider impacts around the airport. A large increase in passenger numbers will invariably increase traffic movements around the airport. Whilst this increase might in some way be offset by improvements to emissions from vehicles, it is noted that the air quality targets are also being tightened. Therefore the future baseline against which the operations are measured is likely to change.
- 6.9. Importantly, no evidence has been presented to suggest that the baseline year for 2028 will be the peak in terms of noise and air pollution around the airport.

2 A future baseline year beyond 2028 should be considered along with an assessment of the passenger demand.

3 Clarification over the passenger forecast should be provided as this is intrinsic to both the fleet composition which relates to the noise envelope of aircraft and the movement of passengers around the airport which is integral to understanding air pollution levels.

Fleet Composition and Airport Operations

- 6.10. The ES will need to include the fleet composition being used in the assessment. The noise and air quality impacts from aircraft are different and therefore the fleet composition is likely to be an important determinant in the assessment. This would best be set out against the most appropriate baseline position (i.e. 2019, the last full operation) with forecasts for how this might change.
- 6.11. It will also be necessary to set out the specific schedule of activity, the respite periods, the operational expectation related to number of movements and times of day. This must be a reasonable worst case scenario. This will reduce the likelihood of concerns raised during the assessment that the modelled outputs do not reflect what may happen in reality.

4 Confirmation of fleet composition, specific schedule of aircraft movements including night flights, and expected operational requirements in the forecast years.

Future Developments

6.12. It is noted from the Report that the construction activity is likely to be considered minimal and not within the scale that would cause likely significant environmental effects however, it is not clear how it relates to other planned activity at the airport. There is currently resurfacing works being undertaken at the airport with associated construction activity, and there is partial demolition planned for Terminal 1 along with proposals for a new Terminal 2 baggage handling facility. The ES must consider the cumulative impacts of development which in EIA terms is generally considered to be committed development i.e. development with the starting point of being at least 'approved and not yet commenced'.

5 The ES should include a programme of planned activity in the context of these proposals to ensure overlaps with any other ongoing works are understood.

6.13. The ES should also provide clarification on the proposed air space changes being advanced elsewhere and a commentary on how these overlap with these proposals. In particular, the ES should explain how and when these are being assessed cumulatively.

6 The ES should include a programme of planned airspace changes and set out the assessment procedure for considering the cumulative changes.

Assessment Topics

7. Air Quality

7.1. The general approach to the assessment is broadly acceptable. Based on the previous assessment there was an eventual acknowledgement of the need for air quality mitigation (agreed S106 contribution of £540,000) although HAL did not acknowledge harmful impacts. Based on that position and this Report there are likely significant effects associated with the operations as previously identified.

7 Air quality impacts from the operations should be scoped into the ES.

Air Quality Baseline

- 7.2. A particular issue from the previous submission was the approach to forecasting within the ES. No baseline for the year of submission (2013) was provided, instead a forecasted air quality level for 2017 (assumed operations commencement) was provided. The evidence to support the optimistic trend between 2013 (eventually provided by the LPA) and 2017, the forecasted year presented in the submission, was lacking.
- 7.3. It is noted that the baseline assessment years of 2017, 18 and 19 will be used to develop the forecasted year on commencement (2028) but it must be stressed that this will need to be based on a reasonable worst case scenario. It is also important to be transparent about the method for forecasting. Finally, it will be necessary to ensure that the 2028 baseline position is clear and open to scrutiny, this is particularly important regarding passenger forecasts for 2028. The commentary on the years subsequent to this is provided above.
- 7.4. Air quality status reports (ASR) for 2023 are now available and should be considered within the ES. Based on the LBH ASR, air quality levels are still lower than pre-pandemic levels but rising from those recorded during the pandemic. Understanding future trends will be critical and should be part of a collaborative exercise.
- 7.5. In addition, whilst additional air quality assessment has been undertaken in Longford using diffusion tubes, the reporting timeframe does not provide for a robust baseline. If this data is then used to extrapolate a 2028 baseline position for the assessment, then this will have to be precautionary, clearly set out, and with a robust sensitivity analysis.

8 To agree the forecast baseline position prior to compiling the Environmental Statement.

Air Quality and Geographical Scope

- 7.6. Concerns have been raised by Spelthorne Council and London Borough of Hounslow relating to the geographical scope of the air quality assessment. Whilst it is recognised and acknowledged that Longford would be a primary receptor due to increased take off traffic on 09L (Northern Runway) there will be change to overflight patterns on communities to the east and west. The impacted communities have not been set out in the Report or whether there is an expectation that they will be scoped into the assessment. The scope of modelling information referred to is therefore not possible to confirm at this stage.

7.7. It should be acknowledged that this comment relates to both the benefits and disbenefits of the scheme.

9 To further discuss the geographical scope of the air quality assessment to ensure it is comprehensive.

7.8. Consideration of the various air quality action plans from the impacted Authorities will be necessary. These have not been identified in the Report but will be an important element of understanding the air quality impacts.

Air Quality and Health

7.9. It is noted in the Report that there is a lack of guidance on how to assess the significance of air quality impacts:

There is no official guidance in the UK in relation to development control on how to assess the significance of air quality impacts. The approach developed jointly by EPUK and IAQM will therefore be used. The potential significance of effects will be determined by professional judgement, based on the frequency, duration and magnitude of predicted impacts and their relationship to appropriate air quality objectives. (5.5.25)

7.10. It should therefore be agreed how best to determine significance prior to undertaking the assessment. Air quality impacts should generally be considered in relation to existing concentrations (noting table 5.9) but also the wider context on health. It is not prudent to set a methodology that only considers changes to concentrations.

7.11. Furthermore, planning policies in terms of the air pollution assessment are currently set against air quality neutral (or better) objectives and in turn, the assessment of significance needs to reflect this. It is therefore noted that table 5.9 is not compatible with assessing harm to air quality in line with LBH and GLA policies.

7.12. Further, table 5.9 does not reflect the health impacts which is the real determinant when assessing air quality impacts. Noticeable spikes in air pollution can have detrimental impacts on the population even if the 'averaging' required for air quality monitoring remains relatively low.

7.13. Noting the comment above at 5.5.25 and given the air quality position on the previous application, it would be prudent to work with the LPA to ensure that the 'professional judgement' in determining significant effects is a collaborative exercise.

10 To work with the LPA and neighbouring authorities to determine the assessment of significance prior to developing the ES further.

Air Quality and Construction Traffic

7.14. It is noted that the Report concludes that air quality impacts from construction traffic are to be 'scoped out'. The transport commentary states:

Daily HGV movements related to the construction phase would be very limited, construction is for a short period on an existing busy road, and materials will be sourced locally where possible.

7.15. Busy roads are linked to areas of poor air quality and therefore any increase in movements has the potential for detrimental impacts. However, the Report does not identify where 'the busy road' is nor the expected quantum of HGVs relating to construction. Spelthorne Council has raised concerns over roads in their boundary that are at, or, exceeding air quality limit values. Consequently, any increase in movements in those areas are of particular concern.

7.16. Notwithstanding the concerns raised by Spelthorne Council, it is still considered that there are no likely significant effects from construction traffic. This statement needs to be qualified with reference to Regulation 15(9) which allows for an alternative approach should more information come to light.

7.17. A subsequent planning submission would be expected to be accompanied by a transport statement at the least which should reveal the extent of construction traffic. This could result in new likely significant effects being revealed and needing to be reported on in an amended ES. In any event, the air quality impacts of the construction will form part of the planning submission as this remains a material planning consideration even if not specifically scoped into the more substantial ES.

11 Construction traffic to be scoped out of the ES with respect to air quality impacts at this stage but it is recommended that HAL clarify construction arrangements and quantum of HGVs in particular at the earliest opportunity.

8. Noise and Vibration

Noise and Future Baseline

8.1. The general position of scoping in noise impacts within the ES is acknowledged and

accepted. The previous assessment identified significant effects associated with noise impacts that required mitigation and it will be a fundamental matter for a future submission.

- 8.2. With regards to noise, the receptors identified in the People and Communities section should ensure the range of sensitive receptors is covered. Schools and places of education, places of worship, community facilities, medical facilities, noise sensitive businesses and commercial operations, open spaces and areas of recreation should all be considered separately with regards to noise. Residential properties (including care homes and residential facilities) should also be scoped in to the assessment.

12 Noise impacts from the operations should be scoped into the ES.

- 8.3. The baseline position on noise on commencement of operations needs to be clarified particularly given the comment at 6.3.20 that without the development there would be a reduced noise exposure:

Without the proposed development, noise exposure is expected to reduce from the levels reported in Table 6.4. This is due to the continued modernisation, and improved noise emissions of aircraft operating at the Airport.

- 8.4. The conclusion that the airport would be operating with a lower level of noise on opening (2028) needs to be properly evidenced. If there is an intention to use a forecast level of noise associated with the 'do nothing' scenario in 2028 compared with the 'do nothing' scenario on submission (2024) then there must be a clear and robust evidence base. As set out above in relation to air quality, the previous submission made unevidenced assumptions about a future scenario that resulted in a reason for refusal.
- 8.5. Furthermore, even if noise levels have reduced, this does not necessarily equate to an improved noise envelope. As set out in the various survey of noise attitudes relating to aviation noise, sensitivity to noise is increasing with associated annoyance and health effects materialising at lower noise levels.

13 To agree a baseline noise position (i.e. on opening in 2028 without the development) prior to undertaking work on the ES.

Noise Scope of Assessment

- 8.6. The broad scope of receptors presented is accepted. However, the specific receptors (i.e. residential and non-residential) within the assessment area will be dependent on the preferred metrics and linked to issues relating to health.

- 8.7. By divorcing health, people and communities and noise into three distinct categories there is a degree of confusion over the full scope of the assessment. For example at 6.5.16, it is stated that the noise effects will be assessed in relation to 4 specific health related metrics; health is mentioned again in the people and communities section and a different, further, set of metrics set out in the health section.
- 8.8. The linkages between the noise section and health section are not clear nor how impacts and effects will be quantified and presented. The methodology for the People and Communities section and the Health section are not as advanced as for Noise. This may be the cause for the concern.
- 8.9. Notwithstanding the above, the general impacts on health appear to be included, for example in table 8.7 (health section) but it's not clear how the metrics set out in 6.5.16 (noise) will co-relate. The ES will need to fully present how the different topic areas overlap and connect.

14 To clarify the scope of noise assessment for each topic in a consistent tabular form with clarity of overlaps and interdependencies.

Assessment of Noise Metrics

- 8.10. The noise metrics presented in table 6.6 are broadly acceptable although further consultancy support for the LPA may result in requests for further information.
- 8.11. At this stage it is not yet possible to support the chosen 'primary metrics' or how they will be used in conjunction with the 'secondary metrics' and those for 'sensitivity testing'.
- 8.12. Similarly, when considering the health impacts from noise it is acknowledged that averages are not necessarily sufficient to determine effects. CAP1278 for example states:

With regard to night noise and sleep disturbance, there is growing recognition that average indicators such as Lnight are insufficient to fully predict sleep disturbance and sleep quality and that use of number of noise events (LAm_{ax}) will serve to help understanding of noise-induced sleep disturbance.

- 8.13. As it is not yet clear how the noise metrics are going to be used to determine health effects or what evidence base is to be relied upon, it is not possible to fully accept that the scope of metrics is sufficient. For example, N60 noise data is to be provided in relation to sleep disturbance but is identified as a 'secondary metric'. How these fits

with the higher noise levels (LAmax for example) set out in CAP1278 is unclear, nor how the 'N' metrics will inform the assessment of health effects.

8.14. In addition to the above, Spelthorne Council has requested an additional assessment using the 55db Lamax (N55) level. The LPA would support this request given the commentary above.

8.15. Notwithstanding the above, the range of metrics presented so far is welcomed and supported alongside the additional use of N55.

15 To clarify the scope of noise assessment and evidence base in relation to health.

16 To add N55 to the suite of noise metrics to be presented.

Noise – LOAEL and SOAEL

8.16. The noise assessment provides information on Lowest and Significant Observed Adverse Effect Levels (LOAEL and SOAEL) however it is not clear how they correlate to the health section. LOAEL and SOAEL are effectively health related metrics so reporting these in the noise section and then again reporting separately on the health effects associated with noise in the 'health' section is unclear.

8.17. In relation to SOAEL, the LPA cannot yet support the level at which it is defined in the Report. The national policy statement for England states:

It is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times. It is acknowledged that further research is required to increase our understanding of what may constitute a significant adverse impact on health and quality of life from noise. However, not having specific SOAEL values in the NPSE provides the necessary policy flexibility until further evidence and suitable guidance is available.

8.18. The justification for setting SOAEL at 63dB Laeq16hr appears to be the threshold for where noise insulation is required. It does not appear to be evidence based in relation to the onset of significant adverse health effects nor receptor specific. Significant effects are likely to occur at different levels for different receptors. For example, schools have stringent acoustics standards and cannot be treated in the same way as

residential receptors. The methodology must be flexible to accommodate the different the receptors.

- 8.19. The use of SOAEL for Gatwick expansion reaches the same threshold as in the Report but for entirely different reasons thus demonstrating the lack of supporting justification:

For daytime, the SOAEL is set at Leq, 16 hour 63 dB. This represents the exposure level at which the most recent UK annoyance survey (CAA, 2014) indicates that 23% of the population would be highly annoyed.

- 8.20. CAP1506 provides the source data for the above. This evidence base also sets out that there was a nearly 20% highly annoyed rate between 57 – 59.9dB Laeq16hr thus raising questions why the 23% threshold was used. The Gatwick example is used to illustrate the inconsistencies in approach and the lack of a clear framework within the industry. They also reveal a disconnect with the underlying evidence on health impacts. The ES must therefore provide clear justification for the level of SOAEL and how it is supported in relation to health evidence.

- 8.21. Similarly, in relation to LOAEL, the explanation in the Report relating to its use in the air space change process provides a more robust justification but it still requires explanation in the context of health effects and an evidence base. For example, in the design manual for roads and bridges (2020), the nighttime LOAEL associated with operational levels is 5dB less than presented in the Report.

17 To work collaboratively to agree the correct approach to LOAEL and SOAEL along with the supporting evidence base.

Noise – Magnitude of Change

- 8.22. Given the above, the LPA cannot yet accept the approach to the magnitude of change set out in the assessment methodology. It is noted that only those defined as at least a ‘moderate change’ in noise exposure would be considered a ‘significant effect’ and subject to a follow up analysis as set out in 6.6.45.
- 8.23. It is not clear how the ‘follow up assessment’ or how the presented ‘secondary’ metrics will be weighted to offset identified harm. The ES will need to provide a robust methodology of its usage and, in particular, how the noise mitigation measures will impact the significant effects identified.

- 18 To work collaboratively to agree the correct approach to determining the onset of significant effects and how the mitigation measures are used to reduce or remove significant effects.**
- 19 The ES will consider the likely significant effects in accordance with the regulations however, planning policies will still require all adverse effects to be considered.**

Noise – Construction

8.24. The general approach to construction noise is broadly acceptable as presented but further work with the LPA's noise consultants will clarify matters.

- 20 The approach to assessing construction noise is broadly accepted with further discussions welcomed with the LPA noise consultant to finalise specific methodologies.**

8.25. It is noted that noise from construction traffic is intended to be scoped out. The construction traffic details are not yet known but is unlikely to be of an extent that would give rise to likely significant environmental effects. This position may change based on disclosure of more information.

8.26. Regardless, it is understood that a large body of the construction work would be undertaken at night to reduce operational impacts on the airport. If this leads to HGV movements at night, then the noise impacts become more of an issue. This will need to be assessed within a subsequent application.

Noise – Quiet Areas and areas of recreation

8.27. Designated quiet areas have been scoped out of the assessment but will be considered further if any are identified. LB Hounslow has raised concerns about how their open spaces and advises of policies that can allow for the identification of quiet areas.

There are currently no designated Quiet Areas designated within the adopted Local Plan (2015) however Policy EQ5 – Noise, part (e) states that the Council will consider the designation of Quiet Areas and identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are valued for their recreational and amenity value for this reason. Hounslow will be revisiting this policy as part of the new single Local Plan.

21 Further considerations of quiet areas and areas of open space would be welcomed.

9. People and Communities

- 9.1. The general approach to the assessment of effects is acceptable. Although noting LB Hounslow's consideration of the baseline position:

Paragraph 7.3.12 states that there are 'relatively minor differences across the area in average socio-economic indicators, with an appreciably narrower range of effects than the range seen at national level. There is a relatively homogeneous residential character across the area.' This is not a conclusion we support in Hounslow and would encourage greater consideration on some of the assumptions made on account of this.

22 The areas to be scoped in as set out within the People and Communities Chapter is agreed alongside further collaboration on the baseline position.

- 9.2. It is noted that the full methodology and supporting evidence has not yet been presented nor has an explanation as to how it will be used:

Criteria for significance will be developed alongside the estimates of effects to meet the requirements for assessment of the specific types of effects according to the characteristics of receptors, as well as meeting good practice for criteria (such as being easy-to-use). Outcomes for assessments of significance will use the categories defined in the generic project-wide approach of 'Major', 'Moderate', 'Minor' or 'Negligible'. Effects can be either beneficial or adverse.

- 9.3. It would be prudent to agree this criterion before seeing the outputs of the assessment in the ES. In particular, it will be important to understand how noise impacts for the various receptors will be measured and presented. As stated above, there will be inconsistencies as to how receptors will be impacted by noise. The sensitivity of the receptor will dictate how the noise assessment will be undertaken, for example using a LAeq16hr metric for an educational facility may not adequately reflect the noise exposure; a LAeq 8hr metric might be considered more prudent.
- 9.4. In relation to educational facilities, LB Hounslow has identified specific requirements about internal standards for teaching and learning. The LPA shares the concerns raised and expect the ES to be detailed enough to tailor the noise assessment to the specific

sensitivity of a receptor, for example maintaining acoustic standards of Building Bulletin 93 (BB93).

- 9.5. Similarly, the impacts on open space will need to be considered carefully. For example, Cranford Park is likely to be subject to an increase in noise. This is a well-used resource for the local populations in an area with sparse access to open space. Its sensitivity to harmful noise impacts therefore increases due to its high value status and little alternatives available. Parks and spaces to the east and west of the airport are equality sensitive to change and the relevant authorities should be included in the development of the assessment.
- 9.6. Further, LB Hounslow has raised matters relating to equality and advise the ES should reference and consider 'Planning for Equality and Diversity in London: Supplementary Planning Guidance to the London Plan (2007) to guide the EIA chapters on People and communities.'
- 9.7. They also raise matters in relation to the Equality Impact Assessment and expect one to be provided as part of the submission. The LPA agrees with this position and clarification is necessary.

23 Clarification on the evidence base, assigning sensitivity to receptors, how the noise metrics will be used and how significant effects will be defined would be welcomed.

24 Clarification on the development of an Equalities Impact Assessment is welcomed.

10. Health

- 10.1. The general approach to the assessment of health is broadly acceptable although noting the request for clarity in relation to the assessment of noise.
- 10.2. As above, the specific evidence base and the way it will be used is not yet clear and further discussions would be welcomed to reach a collaborative position prior to work commencing on the ES.

25 The topics scoped into the assessment is accepted noting that further understanding of the evidence base may require different measurements (i.e. specific types of health effects) to be included.

26 Clarification on the evidence base, assigning sensitivity to receptors, how the noise metrics will be used and how significant effects will be defined would be welcomed.

11. Historic Environment

11.1. The impacts on the historic environment are considered likely to be minimal as concluded within the previous assessment:

On balance the effect of construction on the potential buried archaeological resource is not considered to be significant. (8.8.7, 2013 ES)

On balance the operational effect on sensitive heritage assets is not considered to be significant. (8.9.4, 2013 ES)

11.2. It is acknowledged that a proposed noise barrier in Longford could have a detrimental impact on the conservation area, but this alone does not reach threshold of achieving a likely significant effect when applying the criterion in the Regulations.

11.3. Consequently, the impacts on the conservation area would be akin to normal development and not of an exceptional level that would undermine the designation to a significant extent.

11.4. The harm to the conservation area from any noise barrier will therefore be assessed within the scope of normal planning policies without triggering the need for the exceptional assessment within the ES.

11.5. Similarly, the archaeological impacts of the construction work were assessed previously and deemed to have low likely impact. There is nothing substantially different about this submission to warrant an alternative approach.

11.6. The operational impacts of the airport on the use and value of the conservation area assets to the community will be assessed through the 'people and communities' section.

27 The impacts on the historic environment should be scoped out of the ES but will be considered as a material planning matter through the conventional application of planning policies.

12. Landscape and Visual Impacts

- 12.1. The proposed noise barrier will likely have an adverse visual impact on Longford however the extent of this is not likely to be significant in the context of the EIA Regulations.
- 12.2. The landscape is not particularly sensitive in the context of the EIA Regulations (i.e. nationally or internationally designated) and is currently dominated by an operational airport. There is an existing noise barrier in situ around Longford which provides attenuation to the neighbouring airport. The magnitude of change is therefore of a low nature and the sensitivity of the receptor is low to moderate.
- 12.3. The visual impacts of the barrier will still need to be considered as part of the material planning matters in accordance with planning policies. This will identify any likely harm and measures to reduce or avoid such harm where feasible.
- 12.4. The operational impacts on the landscape are also not considered to be a likely significant effect. The use of the landscape, particularly the open spaces that will be subject to a change in noise levels, will be assessed through the People and Communities section with overlaps in relation to health.

28 The visual impacts on the landscape can be scoped out of the ES but will be considered as a material planning matter through the conventional application of planning policies.

13. Biodiversity

- 13.1. The approach to the assessment of likely biodiversity effects is acceptable. The previous submission found no likely significant environmental effects, but the biodiversity baseline has changed and would warrant further assessment.
- 13.2. This is particularly necessary given the change in flightpaths over highly sensitive national and international level receptors. The baseline information should be shared with the LPA as soon as practicable and Natural England engaged in the subsequent development of the assessment.

29 The impacts on biodiversity should be scoped into the ES as set out in the Report.

14. Scoped Out Topics

Topic	HAL Position	LBH Position	Comment
Land Quality	Scoped out	Agreed	No comments to add to the findings of the Report
Major Accidents and Disasters	Scoped out	Agreed	No comments to add to the findings of the Report
Traffic and Transport	Scoped out	Agreed	<p>Details on HGVs have not yet been provided but the impacts on the network is unlikely to be significant. Matters relating to air quality are considered elsewhere.</p> <p>Transport impacts will still need to be addressed as a material planning matters through a subsequent planning application.</p>
Waste Management	Scoped out	Agreed	No comments to add to the findings of the Report
Vortex Damage	Scoped out	Agreed	<p>Whilst the topic can be scoped out, LB Hounslow has raised matters relating to increased impacts from the new operations and advise it should be Scoped In. However, no evidence on the rationale for this is provided. The LPA maintains it can be scoped out.</p> <p>Notwithstanding that, this will be a material planning matter and a commentary on the increased risk of vortex strikes, alongside likely locations will be required in the planning</p>

			<p>submission. Mitigation and action plans to reduce any identified harm will also be expected.</p>
Greenhouse Gas and Climate Change	Scoped out	Agreed	<p>It is accepted that Aviation and Climate Change are controversial matters, however, based on the facts presented in the submission, there is no reason to believe the impacts of the proposals would result in a likely significant climate change effect.</p> <p>The proposals do not result in a higher level of ATMs and therefore the level of impact would be commensurate with that.</p> <p>Identifying no likely significant effects is not to say there won't be any effects. A planning application will need to consider this material planning matter through the submission.</p>
Hydrology and Hydrogeology	Scoped out	Agreed	<p>There will be an increase in hardstanding although this will be a negligible in the context of water runoff and flood risk.</p> <p>The subsequent planning application will need to demonstrate an appropriate drainage strategy though, along with details of water quality protection; presumably the additional hardstanding will result in an increase in de-icer to be used. De-icer is contaminant so the subsequent planning submission will need to demonstrate existing arrangements will accommodate the changes.</p>