



***EASTERLY ALTERNATION
INFRASTRUCTURE PROJECT***

***Environmental Impact Assessment
Environmental Statement, Volume III
Appendix 1.6 Scoping Opinion***

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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>
<p>Greenhouse Gas and Climate Change</p>	<p>Scoped out</p>	<p>Agreed</p>	<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>
<p>Hydrology and Hydrogeology</p>	<p>Scoped out</p>	<p>Agreed</p>	<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>

Re: Heathrow Scoping Opinion - our ref. 41573/APP/2023/3159

Scott Schimanski <Scott.Schimanski@london.gov.uk>

Tue 2023-12-12 12:43 PM

To: Ed Laughton <elaughton@hillingdon.gov.uk>

You don't often get email from scott.schimanski@london.gov.uk. [Learn why this is important](#)

Hi Ed,

It was good to meet you the other day. I just want to let you know that the GLA will not input into the scoping Opinions.

I'm on leave from next week and will be away for most of January so it might be worth having a chat before I go. Are you available on Friday morning?

Scott

From: Ed Laughton <elaughton@hillingdon.gov.uk>

Sent: 11 December 2023 15:41

To: Scott Schimanski <Scott.Schimanski@london.gov.uk>

Subject: Heathrow Scoping Opinion - our ref. 41573/APP/2023/3159

Hi Scott,

I hope you're well, it was good to meet over Teams recently when we discussed Heathrow's proposals. I'm just emailing to make sure you received the consultation on the Easterly Alternation Scoping Opinion under our ref. 41573/APP/2023/3159. I don't believe this is an application type that requires consultation via the GLA portal (there is no referral option for these cases on the GLA website), but if you need me to go through that process for your admin then let me know asap.

I have asked consultees to respond by the 5th of January, can you let me know if that date works for you. Thanks

Kind regards

Ed Laughton

Strategic Applications and PPA Manager
Regeneration and Environment
Central Services
Civic Centre (3N)
Hillingdon Council
tel: internal: 7890



Ed Laughton
London Borough of Hillingdon

05 January 2024
Ref: PQ/23/43757/ACKL

Dear Mr Laughton

LBH Reference: 41573/APP/2023/3159

Proposal: Request for Scoping Opinion under Regulation 12 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for Easterly Alternation Infrastructure project

I refer to the above matter requesting comment from the Buckinghamshire Council in relation to a Scoping Opinion currently being considered by the London Borough of Hillingdon.

This response is based on the information submitted under reference 41573/APP/2023/3159 (viewable on the LB Hillingdon planning application search) including the Easterly Alternation Infrastructure Project Scoping Report (November 2023).

Comment has been sought from the relevant technical specialists at the Buckinghamshire Council and collated for ease of reference into the table below.

Specialist	Comments
Strategic Environmental Protection: Sound Noise and Vibration Comments	<p>Thank you for the opportunity to comment on the above application.</p> <p>I have reviewed Section 6 (Noise and Vibration) of the scoping report and in particular those areas to be scoped out.</p> <p>Namely</p> <p>Hearing Loss Health and Quality of Life Effects from Surface Access Health and Quality of Life Effects from Construction Traffic Direct and Indirect Effects on Quiet Areas</p> <p>This approach is reasonable and the justifications given acceptable.</p> <p>The construction noise assessment will not include Buckinghamshire receptors, however given the distance from the development to the nearest receptor this is also reasonable.</p>



	<p>It is welcomed that health effects some of which are linked to noise exposure are to be scoped in (see Chapter 18).</p> <p>Conclusion</p> <p>The Council has no objection to the matters included in Section 6 (Noise and Vibration) of the Environmental Impact Assessment Scoping Report provided by the applicant dated November 2023.</p> <p>Note: This memo only includes comments relating to sound noise and vibration. No other environmental health matters are covered. Where relevant, these comments will be provided separately.</p>
<p>Strategic Environmental Protection: Air Quality Comments</p>	<p>Thank you for consulting us on the proposed development outlined above.</p> <p>Heathrow Airport lies to the southeast of Buckinghamshire in the London Borough of Hillingdon. Any impact on local air quality within Buckinghamshire would be because of increased surface traffic at either the construction or operational phase.</p> <p>Having reviewed the scoping documents provided as well as the previous application and appeal decision notice it is understood that proposed scheme does not increase the number of passengers or flights leaving or arriving the airport.</p> <p>The requirement to undertake an air quality assessment for both construction and operational traffic has been discussed in the scoping opinion. The development screening criteria outlined in the IAQM Land-Use Planning & Development Control: Planning for Air Quality Guidance in Buckinghamshire then an Air Quality Assessment is required. The 1st stage criteria are</p> <p>A. If any of the following apply</p> <ul style="list-style-type: none"> • 10 or more residential units or a site more than 0.5ha • More than 1000m² of floor space for all other uses or a site greater than 1ha <p>B. Coupled with any of the following:</p> <ul style="list-style-type: none"> • The development has more than 10 car parking spaces • The development has a centralised energy facility or other centralised energy facility or other centralised combustion process. <p>The 2nd stage screening thresholds for residential development includes</p> <ul style="list-style-type: none"> • An Annual Average Daily Flow (AADF) of greater than 100 vehicles below 3.5 tonnes and an AADF greater than 25 Heavy Goods Vehicles if the development is located within, or adjacent to, an Air Quality Management Area. • An Annual Average Daily Flow (AADF) of greater than 500 vehicles below 3.5 tonnes and an AADF greater than 100 Heavy Goods Vehicles if the development is not located within, or adjacent to, an Air Quality Management Area



	<p>Traffic flows over these thresholds indicates the need for an air quality assessment, whether this takes the form of a Simple or Detailed Assessment. If none of the criteria are met, then there should be no requirement to carry out an air quality assessment for the impact of the development on the local area, and the impacts can be considered as having an insignificant effect.</p> <p><i>This memo only includes comments relating to air quality. No other environmental health matters are covered. Where relevant, these comments will be provided separately.</i></p>
Highways	<p>Heathrow Airport lies outside the Buckinghamshire administrative area, and would therefore only impact the Buckinghamshire Highway network if large additional vehicle movements were to be proposed.</p> <p>I have reviewed the scoping documents provided as well as the previous application and appeal decision notice. From the information supplied the proposed scheme is described as being of a relatively small scale, and would have no bearing on the passenger capacity of the airport. It is also noted that the previous application and subsequent appeal did not consider highways impacts.</p> <p>Mindful of these considerations the only matter of interest to the Buckinghamshire Highway Authority would be to consider construction impacts. Again these are described within the scoping note to be small enough to not be considered by the EIA. Buckinghamshire are content that this position should not be challenged.</p> <p>It would however be appropriate to require a Construction Traffic Management Plan to be submitted and adhered to through the construction period. This should give adequate consideration to the origin of construction trips and identify any sensitive locations that construction vehicles may be required to pass through. Should such sensitive locations be identified, routing or management strategies should be considered and submitted to the Local Highway Authority for approval.</p> <p>Buckinghamshire Council considers that the only area of concern to this Highway Authority would be for any construction trips originating within the Iver area, and would request consultation on any CTMP that shows that this area would be impacted by the scheme.</p>
Climate Response Team	<p>Preamble</p> <p>The Climate Response comments cover document ‘November 2023 Easterly Alternation Infrastructure Project EIA Scoping Report’ dated November 2023.</p> <p>Whilst Heathrow Airport lies outside of Buckinghamshire’s administrative boundary, Buckinghamshire Council is an interested stakeholder given our proximity to the airport and application site.</p>



Proposal

Heathrow airport intends to seek planning permission for the development of additional infrastructure within the existing Heathrow site to facilitate easterly departures from the northern runway during easterly operations. The Cranford Agreement (albeit now withdrawn) and lack of infrastructure on the western end of the northern runway currently inhibits this. Nonetheless, there are flight paths and procedures already in place for easterly departures on the northern runway.

As highlighted within the EIA Scoping Report, the proposed alterations would not result in any changes to the operating hours of the airport, nor would it exceed the current annual cap of Air Transport Movements. It is also acknowledged that between 2003 and 2022, easterly operations have occurred only 28% of the time at Heathrow Airport.

The applicants have proposed that 'greenhouse gas and climate change' are scoped out of the Environmental Impact Assessment (EIA). This is because the applicants consider the changes in the levels of greenhouse gases and associated effects on climate change due to the proposed development to be very small and therefore, not significant.

We have no objections to this proposal.

It is also proposed that Climate Change Resilience is scoped out of detailed consideration in the EIA. This means that the vulnerability of assets and receptors to climate change will not have a dedicated section in the Environmental Statement. However, the EIA Scoping Report confirms that the impacts of climate change and appropriate mitigation will be considered in other relevant chapters of the EIA e.g. biodiversity and hydrology and hydrogeology.

We have no objections to this proposal, subject to climate change (impacts and mitigation) being considered within relevant chapters of the EIA, as stated within the EIA Scoping Report.

The applicants have also committed to submitting a Whole Life Cycle Carbon Assessment alongside the planning application which will set out the measures taken to reduce the carbon footprint during construction and operation. We welcome this proposal and request that the submission of these details is secured.

Recommendation

The Climate Response Team at Buckinghamshire Council have no objections to the proposal to scope out greenhouse gases and climate change from the EIA. This is subject to the following:



	<ul style="list-style-type: none">• The impacts of climate change and appropriate mitigation measures are appropriately considered within other chapters of the EIA e.g. biodiversity and hydrology.• A Whole Life Cycle Carbon Assessment is submitted as part of any future planning application.
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Further Comments

- It is noted that Burnham Beeches falls within the identified 'Extended Biodiversity Study Area' and will be considered further within the Environmental Statement due to the operational effects resulting in changes in the atmospheric concentration and deposition of nitrogen and potential for cumulative effects from other nearby developments. It is requested that Buckinghamshire Council is consulted further when a planning application comes forward.
- The updated NPPF should be referred to in the policy context section.
- Section 10 Landscape, should take into consideration the future expansion of the Chilterns AONB/National Landscape.
- The EIA should take into consideration cumulative impacts at the end of each section. Such projects that should be scoped in, both within and outside of the Buckinghamshire area include but are not limited to:
 - London Luton Airport Expansion - NSIP
 - Gatwick Airport Northern Runway - NSIP
 - Slough Multifuel Extension Project- NSIP
 - Western Rail Link to Heathrow - NSIP
 - PL/20/4332/OA - CV MSA, Iver Heath
 - PL/22/3403/FA - Dromenagh Farm, Sevenhills Road
 - 22/06443/FULEA – Marlows Film Studios
 - PL/21/4074/FA- Five Points Roundabout
 - PL/19/4430/FA – Sevenhills Road
 - PL/20/3280/OA and PL/22/2657/FA - Pinewood Studios
 - PL/23/3252/OA – Denham Film Campus

LB Hillingdon will need to satisfy itself that cumulative and in-combination effects and health impacts have been adequately scoped into the environmental impact assessment.

I hope that the above comments are of some assistance, however, should you require any additional information/clarification please do not hesitate to contact me.

Yours sincerely

Laura Peplow
Principal Planning Officer

Laura.peplow@buckinghamshire.gov.uk



Housing and Regeneration

Email: [planning @hounslow.gov.uk](mailto:planning@hounslow.gov.uk)

Development Management

London Borough of Hounslow, Hounslow House

7 Bath Road, Hounslow, TW3 3EB

Ed Laughton
Planning Services
London Borough of Hillingdon
Hillingdon Civic Centre
Uxbridge, UB8 9ST

Email: ELAughton@Hillingdon.gov.uk

Your contact: Hannah Haddad
Direct Line: 020 8583 3119
Email: Hannah.haddad@hounslow.gov.uk
Our ref: L/676/2/232
Your ref: 41573/APP/2023/3159
Date: 15th December 2023

Dear Mr Laughton,

**TOWN AND COUNTRY PLANNING ACT 1990 – RUNWAYS EASTERLY
INFRASTRUCTURE, HEATHROW AIRPORT**

Further to your email to the London Borough of Hounslow dated 21st November 2023, please find our comments to the ES Scoping Consultation for the Runways Easterly Infrastructure at Heathrow Airport attached.

Any statements made within this submission, have been based on the Council's current understanding of the material that has been reviewed to date and we reserve the right to change our position should further information come to light. In particular, we note a vast amount of information in relation to the overall impact of the scheme on our communities that is yet to be made available. In many cases this additional information is critical in allowing the Council to make a more informed decision of the impact of the proposals on our residents.

We therefore expect Heathrow Airport Limited (HAL) to engage further with key stakeholders prior to submission of the Planning Application.

Should you have any queries, or would like to arrange a meeting to discuss further, please do not hesitate to contact me.

Yours Sincerely,

Hannah Haddad
Head of Strategic Applications
London Borough of Hounslow

Request for Scoping Opinion Under The Town And Country Planning (Environmental Impact Assessment) (England And Wales) Regulations 1999

RUNWAYS EASTERLY INFRASTRUCTURE, HEATHROW AIRPORT

Comments of the London Borough of Hounslow

General

The Scoping Report explores the effects of the proposed changes to the existing easterly runways infrastructure and has requested further information to understand cumulative impacts. In October 2023, Heathrow Chief Executive Thomas Woldbye outlined the airport's intention to resume its plans for a third runway with a detailed update on the expansion expected in early 2024.

In accordance with this, LBH would like further clarification of Heathrow's expansion plans to ensure that the cumulative impact of additional aircraft in the area can be reviewed holistically and in its entirety.

Relevant Policy Documents

In addition to the policy documents set out in section 3.2, the applicant should consider the following:

In response include the following information:

- Hounslow Air Quality Action Plan 2023-2028 (Approved at Cabinet 12/12/23)
- Urban Context and Character Study (2014)
- Air quality Supplementary Planning (2008)
- Hounslow Corporate Plan 2022-2026
- Emerging Hounslow Character, Sustainability and Design SPD

Emerging Local Plan

LBH is currently in the process of a Single Local Plan Review that takes forward and consolidates the previously emerging Development Plan Documents:

- Volume 1 Focussed Review
- Volume 2 Site Allocations
- Volume 3 West of Borough Plan
- Volume 4 Great West Corridor Plan

Both Volumes 3 and 4 also cover Opportunity Areas identified in the London Plan (2021)

In accordance with the Local Development Scheme approved at Cabinet (date), the new Plan will undergo Regulation 19 consultation in Summer 2024, submitted for examination in Autumn 2024 and has an indicative adoption date of Winter 2025.

Air Quality

In addition to the legislation and guidance set out in paragraph 5.2.1., the EIA review should include references to the Hounslow Air Quality Action Plan 2023 and Annual Status Reports (available on LBH website).

As set out in these, whilst the baseline has been set as 2019, the number of diffusion tubes in Hounslow has doubled since 2019. We would encourage the applicant to consider 2019 AQ data as well as the 2022, 2023 data which is published on LBH website.

Graphic 5.1. should therefore be expanded to include a wider scope of study to understand impacts on air quality within Hounslow, noting that the locations cited within it are restricted to the immediate vicinity of Heathrow Airport.

Paragraph 5.4.19 notes that that impacts of the proposed development are expected to be greatest in Longford. However, we request that additional modelling is undertaken in Cranford and the immediate surrounds within Hounslow borough to understand the requisite mitigation to minimise air quality impacts in this area.

Paragraph 5.4.40 references the GLA Air Quality Neutral and Air Quality Positive Guidance. We note under AQ Positive, the themes 'better design and reducing exposure' and 'innovation and futureproofing' have been scoped out on account of their claims that they aren't constructing any buildings. However, the aircraft terminals are to be configured so clarity required on whether it applies. For the avoidance of doubt, we would recommend that these are scoped in to ensure that the scheme can be determined in accordance with best practice.

Noise and Vibration

Paragraph 6.5.23 - we note that the document states that there are unlikely to be any formally designated Quiet Areas within the study area and therefore have been scoped out. Until it is confirmed in the Environmental Statement that there are no designated quiet areas, we recommend that they are 'scoped in'. Whilst there are no official designated quiet areas in Hounslow, the borough is home to a number of large parks, open spaces and countryside sites which are frequented by communities for recreational activity and their amenity value.

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.

Hounslow is responsible to provide suitable Indoor Ambient Noise Levels (IANL) for clear communication between teacher and student, clear communication between students and learning and study activities. As a result of the proposal schools in Hounslow will suffer internal levels of noise greater than required by acoustic standards BB93. Additional information is required to understand the implications of the proposal and the noise insulation proposed to mitigate this.

People and Communities

Table 7.1. Should make reference to Planning for Equality and Diversity in London: Supplementary Planning Guidance to the London Plan (2007) to guide the EIA chapters on People and communities.

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.

An Equality Impact Assessment should be provided as part of the application, and the applicant should actively consult with all communities impacted in Hounslow to inform these findings, particular those that are seldom heard.

Health

The ES should more specific across the health and population section. This is particularly relevant to the data being used – whilst it is important to have borough-wide contextual evidence to demonstrate Hounslow's position, it is just as important to include evidence and data regarding the localised areas that are most likely to be impacted more by the change in pattern of aircraft movements. This would therefore highlight inequalities in outcomes but also experiences of those working and living in those areas. So where possible, include ward, or LSOA data for the most affected areas. If the applicant needs assistance on this, they can contact public health, or North West London ICB business intelligence for additional information.

The other aspect around specifics is the health impacts, conditions, diseases that may be worsened or impacted by this proposed change. Some of the terms used such as mental health conditions, cardiovascular and respiratory conditions are broad terms, and encompass a wealth of conditions, some of which have more relevance to the potential impacts of this proposed development compared to others during operation.

Table 8.1: LBH recommend that the Hounslow Health and Wellbeing Strategy 2023-2026, as well as the Air Quality Action Plan 2023, be consulted and referenced as part of the key strategies, alongside the JSNA/Hounslow data hub.

(https://www.hounslow.gov.uk/downloads/file/4095/hounslow_health_and_wellbeing_strategy_2023_-_2026)

Paragraph 8.3.2: should consider findings of the UK Health Security on the health impacts of noise pollution - with a specific focus on transportation noise.

(<https://www.sciencedirect.com/science/article/pii/S0160412023002398#:~:text=Results,%E2%88%BC17%2C000%20from%20aircraft%20noise>)

Table 8.3: The EIA should include evidence and data down to ward level of the most affected areas on top of the borough wide information. This would provide more applicability to localised impacts, as well as identifying if the areas that are likely to be most impacted are the areas that are already experiencing worse health outcomes and inequalities.

Paragraph 8.3.23: Whilst some detail on Deprivation can be found in the Index of Multiple Deprivation, it is important to note that there are varying levels of deprivation experienced and recorded in Hounslow in different areas. Therefore it is important to recognise and acknowledge that different areas and population groups could be impacted more, or less by this proposal.

Table 8.6: LBH supports the proposed scoping set out against the categories of EIA wider determinants of health from IEMA 2022 Guidance.

Paragraph 8.5.6: LBH is in agreement with the questions in the proposed framework. However, the emphasis needs to be on health inequalities in terms of outcomes but also specific population groups. Recognition needs to be given to the longevity of potential impacts and impacts to future population groups.

Landscape and Visual Impact

The assessment about the village not retaining its tranquillity due to aircraft and the A4 does not really reflect what is said in the Conservation Area Appraisal for the Longford Village:

Paragraph 7.0 of the CA details the problems, pressures and capacity for change in the conservation area, "The expansion of Heathrow airport, and the increasing intensity of its use, provides pressure for change. The retention of the special architectural and historic character and appearance of the Conservation Area will be a particular consideration."

Page 20 of the character assessment goes on to state that "Heathrow has a major impact on the southern half of the borough. It is a dominant form in terms of its land use, the infrastructure required to sustain it and the impact it has in terms of safety zones, noise and air quality."

The CA concludes on page 37 that "Indeed the southern quarter of the borough has been wholly dominated by airport infrastructure since the 1940s when Heathrow was significantly expanded. This is a significant departure from the suburban housing, town centres and semi-rural areas that characterise the townscape of the rest of the borough."

This demonstrates the significant impact expansion of Heathrow airport can have on the surrounding residential areas and is a testament to the need to safeguard the existing landscape and visual baseline. As the proposal develops, we would be happy to share some of the character assessments from the emerging Hounslow Character, Sustainability and Design SPD to inform the EIA.

Biodiversity

WSP UK Ltd undertook an updated Preliminary Ecological Appraisal on the proposed site and detailed out the desk study and field survey following CIEEM PEA (2013) guidelines. It provides a list of the assessments on international and national designated statutory sites and non-statutory designated sites and protected, and notable species identified in the proposed site.

The development on the proposed site may result in impacts on the habitats (statutory and non-statutory sites) and wildlife if unmitigated. The ecological assessment must consider fully the impact of the proposal on the commuting and foraging bats and breeding birds, otters and badgers and reptiles (grass snake).

In the PEAR and Biodiversity (Section 11 in ES Scoping Report), no recommendations provided with respect to sensitive lighting plan (with respect to bats). Further detailed recommendations to be provided with respect to bats, breeding birds, otters and reptiles. In the PEAR, there are no opportunities for biological enhancement provided.

In line with the recognised good practice and government policies on biodiversity and sustainability, all practical opportunities should be provided herewith and undertaken to harmonise the built development with the needs of wildlife. The report should be amended to provide biodiversity enhancement of the above-mentioned features.

A watching brief for bats and breeding birds, grass snake, otters and badgers should be submitted to and approved by the LPA, and the development shall subsequently be carried in accordance with the approved details.

The watching brief should include:

- Details of pre-development check (no more than a week prior to works beginning).
- Details of the toolbox talk with anyone involved in the construction of the development in order to make them aware of the potential presence of protected species and what to do in the event of finding any.
- Careful working procedures- to be defined in the statement.
- Details of who will be watching the construction and what qualifications they hold.
- A contingency plan of what to do in case of finding a bat roost, bird nests, otter setts.

Biodiversity Net Gain has been mentioned in the EIA Scoping Report (see Section 11) but has not been detailed. Under the Environment Act 2021, all planning permissions granted in England will have to deliver at least 10% biodiversity net gain from January 2024.

As part of the application, a completed BNG report (including Excel sheet of the Biodiversity Metric calculation) to be submitted.

Due to the sensitivities on site, a Construction Environment Management Plan (CEMP) detailing, in full, measures to protect existing habitat during construction works and the formation of new habitat to secure a habitat compensation and biodiversity net gain of no less than 10% shall be submitted, and the following information shall be provided:

- a) Current soil conditions of any areas designated for habitat creation and detailing of what conditioning must occur to the soil prior to the commencement of habitat creation works (for example, lowering of soil pH via application of elemental sulphur).
- b) Descriptions and mapping of all exclusion zones (both vehicular and for storage of materials) to be enforced during construction to avoid any unnecessary soil compaction on area to be utilised for habitat creation.
- c) Details of both species composition and abundance where planting is to occur.
- d) Proposed management prescriptions for all habitats for a period of no less than 30 years.
- e) Assurances of achievability.
- f) Timetable of delivery for all habitats; and
- g) A timetable of future ecological monitoring to ensure that all habitats achieve their proposed management condition as well as description of a feed-back mechanism by which the management prescriptions can be amended should the monitoring deem necessary.

Lastly, we consider that the geographical scope of study should be expanded to include consideration of SINCs within Hounslow. LBH will work with Heathrow to ensure that these are captured fully as the application develops.

Traffic and Transport

The scoping note indicates that traffic and transport will be scoped out of the EIA as there are no additional traffic movements anticipated, and therefore the threshold for inclusion will not be met.

However, this does not mean that a Transport Assessment would not be required because the thresholds for this are lower than for an EIA. LB Hillingdon should ensure that all necessary traffic and transport information is submitted with a planning application.

It appears that the proposed infrastructure would only mean a change in flight patterns and not an increase in number of aircraft movements, other than related to natural growth that would be expected to occur anyway. The change in flight patterns will impact more on noise and air quality which will need to be addressed.

Vortex Strikes

Note that HAL have a scheme to address vortex damage to domestic and non-domestic properties. This is welcomed.

LBH recommend that Vortex Strikes are scoped into the study and the EIA is developed to identify areas where vortex damage is likely and outline what measures prior to the development coming into operation will be implemented. We also request detailed maps showing the likely areas and buildings affected.

Ed Loughton

From: McVey, Louise <L.Mcvey@spelthorne.gov.uk>
Sent: 05 January 2024 12:24
To: Walker, Kelly
Subject: 23/01502/EIASO, Heathrow Airport, Hounslow, TW16 1QG

Dear Planning

23/01502/EIASO, Request for scoping opinion under regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for Easterly Alternation Infrastructure project.

AT: Heathrow Airport Hounslow TW6 1QG

The Residential Team have reviewed the Environmental Impact Assessment Scoping Report, dated November 2023 included within the above request, in consideration of noise.

The proposed development would lead to regular and scheduled arrivals on Runway 09R (the southern runway) when the wind is coming from the east. This will immensely affect residents of Stanwell Moor and Stanwell, who will see an increase on easterly arrivals. We would expect the Environmental Statement to clearly show the noise impact on Spelthorne Borough. For those areas where there is likely to be an increase in aircraft noise, we would also expect to see what mitigation is being considered to reduce this impact. Additionally, for the areas of the Borough closest to the airport (for example Stanwell Moor and Stanwell) we would expect to see a holistic assessment of both the new ground level baseline noise associated with increased runway utilisation as well as the noise changes associated with the increased aircraft movements. This is to ensure consideration is given to all noise impacts that these residential areas are likely to experience owing to these changes.

The methodology outlined in the Scoping Report for Aircraft Noise is welcomed, especially the additional models adopting the L_{den} and L_{night} metrics, which takes into account both the WHO Environmental Noise Guidelines 2018 from 45dB L_{den} and 40 dB L_{night} . These measurements should help to give us a more accurate understanding on the noise impact from aircraft noise on all our residents.

We would recommend that to further support the assessment metrics of significant effects from aircraft noise to include a 55dB L_{Amax} (N55). This lower level will support our understanding of the noise impact to our residents.

Ultimately, we hope that our views on how aircraft noise affects our borough will be taken into account during the planning process, and during the construction period.

Kind Regards

Louise McVey
Environmental Health Regulatory Officer
(normal working pattern: Monday – Thursday 09.00-16.00)

Spelthorne Borough Council,
Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB
Tel: 01784 444287

Ed Loughton

From: Lucas, Claire <C.Lucas@spelthorne.gov.uk>
Sent: 02 January 2024 18:01
To: Walker, Kelly
Subject: 23/01502/EIASO Pollution Control Comments

Hi Kelly

Happy New Year.

I have reviewed the EIA Scoping Opinion for 23/01502/EIASO.
Please find my comments below.

Planning Reference:	Condition:	Planning Case Officer:
23/ 01502/EIASO Hillingdon ref: 41573/APP/2023/3159	Advisory recommendations to the London Borough of Hillingdon as the relevant planning authority.	Kelly Walker
Pollution Reference:		Pollution Case Officer:
23/04161/AIRQUA Address: Heathrow Airport Hounslow TW6 1QG (EH SR registered to Knowle Green)	(UPRN - N/A out of borough)	Claire Lucas

Advisory recommendations concerning air quality to the London Borough of Hillingdon as the relevant planning authority.

Recommendation:

Secure the CEMP and CTMP by Planning Condition.

Condition the CTMP and share with neighbouring authorities for comment before approval if possible.

Construction traffic may route through neighbouring boroughs. Whilst the applicant notes that the emissions from offsite construction traffic is expected to be a very low percentage of total traffic movements and considered

insignificant in relation to the baseline, the significance will be dependant on where that traffic routes, for example in Spelthorne in 2022 there was NO2 exceedance on Stanwell Moor Road so an increase in that area may be significant. The application mentions HGV movements will be localised due to concrete batching and recycling facilities being in close proximity to the airport, there are such facilities off Stanwell Moor Road such as Oakleaf Farm so significance can't be discounted at this stage. Given the need for night working the applicant would be encouraged to schedule deliveries outside of peak traffic hours to reduce impacts on local air quality.

Please see the *Comments on Submission* section below for further comments on the scope of the proposed assessment methodology.

Should the scope out of further assessment of construction vehicle emissions be agreed to, then it is recommended to secure by planning condition that the daily construction HGV movements remain below the IAQM Planning For Air Quality indicative criteria for the assessment of a change in HDV flows of more than 25 AADT within or adjacent to an AQMA, for the protection of local air quality.

Review of information within the...

1. Heathrow/WSP/Logika –Easterly Alternation Infrastructure Project Environmental Impact Assessment Scoping Report– November 2023 and accompanying drawings.

Summary of Submission:

Request for formal opinion on the scope, level of detail and methodology in respect of the information to be provided in the Environmental Statement which will accompany a planning application that will be made by Heathrow Airport Limited.

An opinion from LBH is being sought, on the following:

- the environmental features likely to be significantly affected by the Proposed Development that should be assessed within the Environmental Statement;
- the approach to defining the study areas for each environmental aspect;
- the data that has been gathered (and will be gathered);
- the assessment methods that will be used to identify likely significant effects;
- the approach to determining the environmental measures that could be incorporated into the Proposed Development to avoid, reduce or, as a last resort, compensate for significant effects; and
- developments that, together with the Proposed Development should be subject to Cumulative Effects Assessment (CEA).

Heathrow intends to seek planning permission for development of infrastructure that will facilitate full runway alternation when Heathrow Airport is operating in an easterly direction (“the Proposed Development”). This will mean departures and arrivals in an easterly direction can alternate between the northern and southern runways, as they currently do on westerly operations.

Communities living west of the northern runway and east of the southern runway would experience respite from continuous overflying on easterly operations. Note that Stanwell Moor is situated to the west of the southern runway and Stanwell is situated to the south of the southern runway.

Section 2 - a description of the Proposed Development

The Proposed Development will lead to a change in aircraft movement patterns on the ground and in the air, during easterly operations only.

The Airport operates two parallel runways, the northern runway (Runway 09L/27R), and the southern runway (Runway 09R/27L) in segregated mode. This means that arriving aircraft are assigned to one runway and departing aircraft to the other. The direction of arrivals and departures is dictated by the wind direction, as aircraft depart and arrive into a headwind because this is optimal for aerodynamic and safety reasons. For this reason, the Airport operates in two directions. These are ‘easterly operations’ for when the wind direction is from the east and ‘westerly operations’ when the wind direction is from the west.

The prevailing wind is from a south westerly direction, meaning the Airport is on westerly operations for most of the time. Generally a higher proportion of westerly operations occurring in the summer months.

To distribute noise effects more equitably and provide respite to surrounding communities, on westerly operations, Heathrow alternates the runways used for departures and arrivals once a day. Operationally this means that from 06:00 to 15:00 departing aircraft are scheduled on one runway and arriving aircraft are scheduled on the other. The schedules are then alternated to the other runway from 15:00 until the final movement in order to provide predictable periods of respite to residents surrounding the Airport. Due to the lack of infrastructure runway alternation has not been possible when on easterly operations leaving Windsor and Hatton to experience noise from arrivals and departures without respite when the Airport is on easterly operations.

Heathrow has two runways: the northern runway (09L/27R) being 3,902m long and the southern runway (09R/27L) being 3,660m long. Both are oriented east to west.

Ground-based infrastructure (such as new taxiways) is required to allow regular and scheduled departures on the northern runway in an easterly direction. Regular and scheduled departures on the northern runway in an easterly direction (Runway 09L) will mean regular and scheduled arrivals occurring on the southern runway (Runway 09R) from the west.

Runways will alternate between departures and arrivals on easterly operations (as they do on westerly operations) at 15:00 each day.

If, on easterly operations the morning sees the southern runway being used for departures and the northern runway being used for arrivals, after 15:00 the northern runway will switch to being used for departures and the southern runway will then be used for arrivals. Using the northern runway for departures over Cranford occurs from Runway 09L. Runway 09R also has published arrival routes. These pre-defined departure routes are known as Standard Instrument Departures (SIDs). Aircraft taking off from Heathrow follow pre-defined routes known as Standard Instrument Departures (SIDs). The choice of SID used is decided by the airline and is predominately dictated by the destination of the aircraft. A SID includes a profile and a minimum rate of climb and will avoid obstacles (such as, tall buildings) and SIDs from other airports which means they don't always follow the most direct route.

When the Airport is operating close to capacity, the infrastructure serving Runway 09L would be insufficient for full runway alternation during easterly operations. The taxiway system for allowing easterly departures from the northern runway (Runway 09L) has not developed as it has to serve the other runway ends. In particular a lack of a Runway Access Taxiway(s) (RATs), which would facilitate the efficient operation of departures in an easterly direction from the runway.

The Proposed Development would lead to regular and scheduled departures from Runway 09L (the northern runway over Cranford) and regular and scheduled arrivals on Runway 09R (the southern runway) when the wind is coming from the east. This change to the use of the runways will change the pattern of aircraft noise. This is likely to lead to a decrease in noise effects for some surrounding communities and an increase in others.

The Proposed Development is comprised of the infrastructure (including taxiways and hold areas) necessary to allow aircraft to efficiently and routinely use the northern runway for departures when the airport is on easterly operations.

The Proposed Development will not result in any changes to the operating hours of the Airport. Furthermore, the annual cap of 480,000 Air Transport Movements (ATMs) imposed as part of the planning permission for Terminal 5 will also remain the same.

The addition of the proposed taxiways and hold areas on Runway 09L will allow regular and scheduled flights to occur with easterly alternation, as well as providing easy access for aircraft to queue and be subsequently placed in the right sequence, to maintain the overall efficiency and operational resilience of the Airport. These changes will not affect the mode of operation of the runways, which will continue to operate in segregated mode.

Existing infrastructure includes runway hardstanding, taxiways, aprons, managed airfield grass and auxiliary buildings. 4 terminals are in operation (T1 is no longer in use for aircraft) T2 and T3 form a cluster of terminal buildings known as the Central Terminal Area (CTA), which is situated in the central part of the Airport between the northern and southern runways.

Heathrow has a taxiway network to circulate aircraft between the terminals and the runways under the guidance of air traffic control. The taxiway network comprises four parallel taxiways (two serving each of the runways), which are linked by cross field taxiways. There are also taxiways south of the southern runway, including one parallel taxiway, connecting T4 and the cargo area to the rest of the Airport. Runway links, including exit taxiways and Runway Access Taxiways (RATs), connect the parallel taxiways to the runways and are used by aircraft entering and exiting the runways. More minor taxiway links and cul-de-sac taxi lanes connect all the taxiways to the aircraft stands.

Aprons are a designated space on an airfield for the parking of aircraft, refuelling, and the loading and unloading of passengers and freight. Each terminal building at Heathrow has its own aprons. Additionally, there is a cargo apron in the south of the Airport for designated freight aircraft and maintenance aprons in the east of the Airport. Aircraft park on the Aprons.

Ancillary facilities include maintenance and repair facilities, warehousing and cargo storage facilities and other airport operational land (such as surface water pollution control, balancing ponds, construction compounds for ongoing work, in-flight catering facilities, air traffic control, baggage and parking for service equipment).

During easterly operations, all aircraft movements (arrivals and departures) are in an easterly direction.

Pg 2.9 & 2.10 illustrate how the runway system will alternate, with the Proposed Development over a two-week period during easterly operations. The designators for each runway are:

- Runway 09L = northern runway on easterly operations;

- Runway 27R = northern runway on westerly operations;
- Runway 09R = southern runway on easterly operations; and
- Runway 27L = southern runway on westerly operations

The main effect in air quality terms would be the increase in the number of aircraft departing on the northern runway (09L) and arriving on the southern runway (09R) during easterly operations and the decrease in the number of aircraft departing on the southern runway (09R) and landing on the northern runway (09L) during the same mode of operations.

Graphic 2.5 Direction of arrivals and departures on 09R and 09L during easterly operations (proposed)



The difference above to westerly operations is that the aircraft take off and land in the opposite direction to easterly operations and operate on 27R and 27L on westerly operations as opposed to 09R and 09L on easterly operations.

The difference above to existing easterly operations is that the week one illustration only is being followed currently.

The application states that the extent of the new airfield infrastructure works is relatively limited, although the exact requirements are still being determined as part of an ongoing design process. Works are likely to comprise of the following:

- Taxiways and links to comprise a hold area(s) at the western end of Runway 09L.
- New Runway Access Taxiway(s) (RATs) on Runway 09L.
- Other associated airfield works, e.g. new connector taxiways or crossing points.
- Areas of additional pavement may also be developed to enable aircraft to access and exit the runways.
- Changes to layout of aircraft stands (501 – 505) to the north of Terminal 5.
- For flood protection some existing areas of redundant paving may be broken up.
- An acoustic barrier may be needed south of the village of Longford.
- The construction period is expected to be approximately 18-24 months a CEMP will be provided at outline within the ES.
- A Construction Transport Management Plan (CTMP) will be developed with the contractor once appointed.
- Construction will take place largely overnight to allow for daytime operation of the airfield.

Airspace Modernisation

- Separate to the proposed development under CAA procedure.
- The Heathrow ACP involves the redesign of the airspace around Heathrow based on a two runway operation, including the introduction of Performance Based Navigation. The Heathrow ACP will incorporate changes to flight paths and procedures for Heathrow as a whole, including its operation during easterly operations.
- The outcome of the Heathrow ACP and the wider FAS1 modernisation will not be known during the preparation and consideration of the planning application for the Proposed Development. As the proposals for the Heathrow ACP develop, they will be subject to their own process of consultation and environmental assessment as detailed in CAP 1616.
- The EIA will be based on the existing airspace design which, as identified in Section 2.1 is already established for the purposes of easterly operations.

Section 3 - overview of the legislation and policies that are relevant to the Proposed Development

The pg 3.12 text on the London Plan indicates that Policy SI1 will apply which includes the construction and demolition Non-Road Mobile Machinery Low Emission Zone.

Section 4 - an overview of the EIA methodology and issues relevant to the Proposed Development

Notes that scoping will identify receptors that are likely to be significantly affected by the Proposed Development; and the work required to take forward the assessment of these potentially significant effects.

The significance is informed by the magnitude and other characteristics of the potential changes that are expected to be caused by the Proposed Development; The sensitivity of receptors to these changes; The effects of these changes on relevant receptors (where relevant); and the value of receptors. Value is defined as sensitivity in paragraph 4.5.5.

Primary, Secondary and Tertiary mitigation are defined, and a description of cumulative effects is given. An assessment will be undertaken of how the environmental effects resulting from the Proposed Development could combine with environmental effects generated by other existing or approved developments. This will be undertaken for each environmental aspect considered in the Environmental Statement.

Table 4.2 explains that a zone of influence approach for each potentially significantly affected receptor will be applied, for air quality the ZOI example given is to be identified by air quality modelling. Inter project effects will consider infrastructure works undertaken by Heathrow around the same time (including those for which Heathrow has permitted development rights), and major projects/infrastructure works within any of the communities that may be significantly affected. The Rochdale Envelope will be applied. where details of the whole project are not available when the application is submitted. The level of detail of the proposals must enable a proper assessment of the likely significant environmental effects - if necessary, considering a range of possibilities. In assessing the likely significant effects, it is consistent with the objectives of the EIA Directive to adopt a precautionary 'worst case' approach so that the maximum potential adverse impacts of the project are properly assessed.

Section 4.9 details the approach to baseline and assessment years. For air quality it would be expected that a baseline of 2019 be incorporated to take into account pre pandemic traffic emissions without the reductions caused by travel restrictions, and their impact upon air quality measurements which will be used in model validation. This is acknowledged in 5.3.11 (pg 5.4).

Sections 5 – 11 - proposed scope and methodology for each technical aspect where, at this stage, a significant environmental effect is considered likely to arise as a result of the Proposed Development. Chapter 5 Air Quality (pg 5.1)

There would be the increase in the number of aircraft departing on the northern runway (09L) and arriving on the southern runway (09R) during easterly operations and the decrease in the number of aircraft departing on the southern runway (09R) and landing on the northern runway (09L) during the same easterly mode of operations. There will be no change during westerly operations.

Principal impacts will be associated with the change in the spatial distribution of emissions across the airfield. Sources other than aircraft, including landside road vehicles, airside vehicles and ground support equipment, and stationary combustion plant, will be unchanged.

The air quality assessment will consider NO₂, PM₁₀ & PM_{2.5}.

The local AQMA's including the Spelthorne AQMA are acknowledged and the Heathrow air quality focus area is acknowledged.

Baseline exceedances for NO₂ close to major roads are acknowledged.

The study area for the assessment will be the 9 km × 9 km region between 503000–512000 easting and 172000–181000 northing. This is the study area used in previous assessments of air quality around Heathrow. The scoping report states that impacts of the Proposed Development are expected to be greatest in Longford, immediately north-west of the western end of the northern runway, with beneficial impacts expected in Stanwell to the south-west of the airport. These will therefore be the key parts of the study area that will be the focus of attention.

NO_x concentrations and levels of nitrogen and acid deposition will be predicted at statutory designated nature conservation sites in the study area.

Concentrations of nitrogen dioxide, PM₁₀ and PM_{2.5} will be predicted at a number of locations close to the Proposed Development. Receptors will be chosen to reflect locations where the Air Quality Objectives apply in line with GLA LAQM Technical guidance. Specific receptors will be identified at representative locations throughout the study area, with the greatest emphasis on the key parts of the study area, namely Longford and Stanwell. A range of other receptors elsewhere around the Airport will be modelled in order to quantify impacts across the study area.

Scoped in for likely significant effects are the following:

- Construction phase airfield engineering works to facilitate the increase in departures and the reduction in arrivals on Runway 09L, combined with a decrease in departures and an increase in the number of arrivals on Runway 09R. Emissions of dust and particulate matter may occur during earthmoving and stockpiling activities, or when vehicles drive over unmade haul roads.
- Construction phase exhaust emissions from road vehicles accessing the Proposed Development area and plant operating on site.
- Operational phase during easterly operations resulting in an increase in the annual number of departures on Runway 09L (northern runway), matched by a decrease in the annual number of departures on Runway 09R (southern runway).
- Operational phase during easterly operations resulting in a decrease in the annual number of arrivals on Runway 09L, matched by an increase in the annual number of arrivals on Runway 09R.
- The principal effect of the Proposed Development from an air quality perspective derives from changes in the spatial distribution of pollutant emissions from aircraft during the various phases of the landing and

take-off cycle, and the consequent effect this has on the airborne concentrations of the key pollutants in residential areas around the airport perimeter. There would be no material change in the overall total emissions (although there would be small changes in total emissions due to the different balance of aircraft taxiing routes).

- Air quality emissions are potentially significant for their effect on human health.
- There is potential for these emissions to affect statutory designated nature conservation sites in close proximity to the airport.

There will be no change in the number of aircraft movements, no change to the aircraft fleet, and no change to landside road traffic or any sources of emissions other than aircraft.

The impacts of the Proposed Development on odour have been scoped out on the basis of odour from aircraft being mainly associated with low-thrust activities, which are focused on the central apron areas of the airfield and are therefore largely unaffected by the Proposed Development.

Air quality neutral assessment is scoped out on the basis that the Proposed Development does not incorporate any new buildings and will not generate any building-related emissions from combustion plant. It will also not result in any increase in road traffic.

The Environmental Statement will be accompanied by an Air Quality Positive Statement to demonstrate how the Proposed Development would lead to positive outcomes for air quality. Since two of the four themes for Air Quality Positive (“building emissions” and “[surface] transport emissions”) are not relevant to the Proposed Development, the Statement would focus on the “better design and reducing exposure” and “innovation and futureproofing” themes.

The following scenarios will be assessed utilising dispersion modelling:

- Three historical scenarios, for the years 2017, 2018 and 2019. These will be used for model verification incorporating 3 years meteorological data. For aircraft sources, the direction in which aircraft land and take off is strongly related to the weather: they normally land and take off into the wind. This means that the location of emissions, as well as their dispersion, depends on the weather. For this reason, it is proposed to use at least three years of meteorological data for the baseline modelling. At each receptor, the modelled concentration from the year giving the highest concentration will be considered in the assessment, to ensure that a worst-case assessment is carried out.
- Opening year With Development scenario, assuming full alternation in easterly operations is implemented; and
- Opening year Without Development scenario, assuming the current mode of easterly operation is retained.

The operational assessment will involve the use of dispersion modelling techniques to quantify ground-level concentrations of air pollutants in the opening year. The assessment will compare the opening year With Development scenario against the opening year Without Development scenario, to determine the impacts arising from the Proposed Development. The assessment will also compare both scenarios against the air quality objectives. As ambient air quality is expected to continue improving into the future and owing to the progressive reduction in emissions from aircraft, it is anticipated that the opening year will represent a worst-case assessment of air quality impacts.

For each scenario, the calculation will involve the quantification of annual emissions for all key sources based on forecast activity data (with output providing the magnitude, spatial distribution and temporal profile of emissions) and subsequent dispersion modelling to calculate concentrations at key receptors. In addition, a forecast will be made of the ‘background’ contribution in the assessment year (i.e. the contribution from all sources not modelled explicitly)

The air quality assessment will include the pollutants nitrogen dioxide (NO₂), PM₁₀, PM_{2.5}, NO_x and nitrogen and acid deposition. Concentrations of nitrogen dioxide will be calculated from concentrations of NO_x using the Defra NO_x to NO₂ calculator.

The effect of the change will be assessed at the key receptors, taking into account both the magnitude of the concentration change and the total predicted concentration.

Aircraft modelling:

Modelled emission sources will include:

Aircraft main engines in the landing and take-off cycle on the ground and up to an altitude of 914 m (3000 feet); • Aircraft brake and tyre wear; • Aircraft Auxiliary Power Units (APU); • Aircraft handling emissions generated by ground support equipment; • Airside traffic operating within the airport perimeter fence; • Infrastructure or stationary sources such as power generating plant and heating / cooling plant for airport buildings; • Road vehicles on airport landside roads and on the major road network around the airport; and • Other sources that contribute to the background concentrations.

Note that, apart from aircraft main engines and aircraft brake and tyre wear, all these sources will be identical between the With and Without Development scenarios.

Aircraft emissions will be calculated in line with the recommendations of the International Civil Aviation Organization's (ICAO) Airport Air Quality Manual and current best practice for airport inventories and modelling studies, the assessment will be largely based on the advanced approaches, but for some parts of the calculation, the simple or sophisticated approaches may be used where they are more appropriate.

Emission factors for aircraft engines will be taken from the latest version of the ICAO databank of engine certification data. The ICAO databank includes manufacturers' measurements of non-volatile particulate matter (nvPM) for the most recent engines, and this will be used in preference to the First Order Approximation (FOA) method for calculating nvPM emissions set out in the ICAO Airport Air Quality Manual for those engines for which data are available. Volatile PM emissions will be calculated using the FOA method.

The historical scenarios will be based on actual aircraft and passenger data. The future scenarios will use forecast aircraft and passenger data provided by specialist aviation forecasters.

Road traffic modelling:

Road traffic emissions will not be changed by the Proposed Development but will be included in the model as they contribute to the overall air pollutant concentrations and therefore affect the significance of any changes due to the Proposed Development. Road vehicle emissions will be calculated using the latest version of the Emission Factors Toolkit (EFT).

The Applicant maintains a model of road traffic flows on the road network around the airport, called the Heathrow Highway Assignment Surface Access Model (HHASAM). A new forecast of road traffic in the opening year will be prepared to support the assessment. HHASAM includes both airport-related and non-airport traffic. The forecasts include traffic growth from non-airport activity, and therefore incorporate the cumulative impact of other plans, projects and developments.

Dispersion modelling will be carried out using ADMS-Airport and ADMS-Roads. ADMS Airport has a specific module for handling the near-field dispersion and plume rise of exhaust plumes from moving jet aircraft.

The approach developed jointly by Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) will be used in describing air quality impacts. 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.

Chapter 8 – Proposed scope for Health

Air Quality is scoped in for further assessment of health impacts.

The estimated spatial area in which air quality impacts are assessed at this scoping stage is based on review of monitoring data including continuous monitoring (see Section 5: Air Quality). There are fourteen continuously

monitored locations within 2km of the Proposed Development, which lies within the Heathrow air quality Focus Area and is also relevant to Air Quality Management Areas (AQMA) in surrounding local authority areas because of possible exposure to elevated nitrogen dioxide levels. The spatial area in the air quality assessment will be more specifically defined using additional dispersion modelling.

The identification of effects will be informed by combining information on the receptors in areas affected by changes from the Proposed Development. For populations in these areas, effects will be identified according to noise, air quality, visual amenity and combined impacts and the health and vulnerability of people and communities as well as other wider determinants of health. For receptors such as healthcare providers, effects will be identified according to the potential changes in levels of demand arising from spatial redistribution of need

Section 12 - identifies those effects that Heathrow considers should be scoped out of the EIA and provides justification for this approach

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. Other traffic will mainly be associated with the small numbers of construction workers (between 20 and 25) driving to the Proposed Development area. It is therefore not anticipated that the increase in traffic flows will exceed 10% and thus effects on traffic and transport at the construction stage are scoped out of the detailed assessment. Please see the Comments on Submission section below for comments regarding the proposed scope out of construction vehicle emissions.

There will be no change to traffic numbers resulting from the implementation of the Proposed Development. For these reasons, there is no requirement for detailed Traffic and Transport assessment related to the Proposed Development.

Comments on Submission:

There is little detailed information at this stage as to which communities will experience an increase in being overflowed and when/ under what conditions. No information is given as to what happens to the aircraft approach on arrival and climb upon departure, and at what heights with the proposed development and what the predicted impacts on air quality will be resulting from this, please include this within the ES.

The Air Quality Assessment does not explain if a diurnal profile will be applied to account for variations in emissions throughout the day, this could be applicable to both aircraft and road emissions, or whether vehicle speeds will be reduced through junctions within the model. Given the location adjacent to a major road that experiences congestion especially during the peak traffic periods in the morning and early evening it is important to apply such knowledge of the area in interpreting the assessment.

Whilst the documentation explains that Heathrow's traffic model will be utilised no info on traffic survey data utilisation is given.

No comment is given as to whether the terminals or other features of the landscape will be included in the air quality dispersion model topography? The development is subject to an HRA and there may be relevant reservoir topography to be considered in that assessment work.

The Scoping Report states that the EIA will be based on the existing airspace design which, as identified in Section 2.1 is already established for the purposes of easterly operations. No consideration/assessment of worst case for each affected/overflowed area in terms of future airspace change? Where is the precautionary principal in this approach, that isn't explained (pg 2.12), pg 4.8 explains that the Rochdale Envelope will be applied but the approach given may not be in line with that.

The future baseline without the proposed development is assumed to be the opening year. This approach for air quality needs clarification. It may be appropriate to hold emission factors and backgrounds at the opening year but there could be a change in receptors in a future year considering Local Plans and also in combined impacts from committed development. No future/design year assessment is proposed beyond the opening year, this is

unusual for a transport related scheme and in the context of airspace change and the potential for new terminals this may be missing impacts associated with that in combination with committed development. It may also mean that future impacts associated with for example the phasing in of PM2.5 targets are missed.

Hillingdon's Air Quality Action Plan is not referenced.

An air quality monitoring survey using passive nitrogen dioxide diffusion tubes has been initiated and will be carried out for a minimum of three months. Details of diffusion tube locations and results will be reported in the Environmental Statement. As a neighbouring LA we would strongly encourage at least 6 months of monitoring to better capture cross seasonality in the data. The ES states that the focussed diffusion tube campaign sites will be divulged in the ES, it is not stated as to whether the applicant has consulted Local Authorities on the monitoring locations?

The applicant should note that more recent air quality ASR data than that which is referenced is now available for Spelthorne here:

<https://www.spelthorne.gov.uk/article/17839/Air-quality-reports>

No detailed information is given as to why there are expected to be beneficial air quality impacts in Stanwell.

5.4.26 and 5.4.27 imply that the construction phase effects remain scoped in however the construction phase is not included within Table 5.8 of likely significant air quality effects and these effects are then scoped out on the basis of receptor distance in 5.4.37 and on the basis of the additional construction vehicle movements being likely to be a small percentage of total flows on the local road network. 2022 diffusion tube based air quality monitoring data for Stanwell Moor Road measured an exceedance of the annual mean NO2 objective therefore even small increases in HGV flows at that location within an AQMA could result in continued non-compliance, SBC would have expected to see information on haul routes, site entrances and vehicle types and numbers and the relevant durations of such activity to be screened and assessed prior to scoping out the effects of construction traffic on local roads.

The Scoping Report states that since the Applicant is already actively working to manage and improve air quality locally, and since the Proposed Development is motivated by environmental impacts other than air quality, scope for additional Air Quality Positive actions is limited. There is not a lot of information given about the weight being given to between air quality versus noise impacts, it is expected that this will be fully explained in the ES as some procedures involving noise abatement during take off can alter aircraft emissions. Will this be included in the Aircraft main engines in the landing and take-off cycle on the ground and up to an altitude of 914 m (3000 feet) for air pollutant dispersion modelling purposes?

Reasoning for Recommendation:

Review of the proposed scope considering the potential for impacts upon local air quality in Spelthorne, conditions are recommended, and comments are given on the applicants scope for the ES submission.

Kind regards,
Claire

Claire Lucas
Principal Pollution Control Officer

Please note, following the introduction of the GDPR, changes have come into force regarding privacy rules and how we store and retain your details. For more information on this our privacy notice is available on our website at the following link <https://www.spelthorne.gov.uk/article/16823/Privacy-Notice-Environmental-Health>, alternatively we can send this to you by post or email.

Spelthorne Borough Council,
Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB

Tel: 01784 446 259

creating a better place



Ed Loughton
London Borough of Hillingdon
Civic Centre High Street
Uxbridge
Hillingdon
UB8 1UW

Our ref: NE/2023/136490/01-L01
Your ref: 41573/APP/2023/3159
Date: 19 December 2023

Dear Ed,

Request for Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for Easterly Alternation Infrastructure project.

Runways Easterly Infrastructure, Heathrow Airport, Hounslow.

Environment Agency Position

The Environment Agency is a statutory consultee on all development projects subject to Environmental Impact Assessment. There are however, no environmental constraints within our remit within this site boundary so we therefore have no comments at this time.

Final Comments

Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us. Please provide us with a decision notice for our records.

Should you have any queries regarding this response, please do not hesitate to contact me.

George Lloyd
Planning Specialist – Green Growth and Delivery

Direct dial: 02030 254843

E-mail: HNLGreenGrowth@environment-agency.gov.uk

End



INVESTOR IN PEOPLE

Date: 08 December 2023
Our ref: 459220
Your ref: 41573/APP/2023/3159



Ed Laughton
Hillingdon London Borough Council
PlanningEConsult@Hillingdon.Gov.UK

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T 0300 060 900

BY EMAIL ONLY

Dear Ed Laughton,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Request for Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for Easterly Alternation Infrastructure project.

Location: RUNWAYS EASTERLY INFRASTRUCTURE HEATHROW AIRPORT HOUNSLOW

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated and received on 21 November 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Kimberley McDowell
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 174-175 and 179-182) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to have regard to conserving biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**:

- South West London Waterbodies Ramsar
- South West London Waterbodies Special Protection Area (SPA)

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>

The ES should thoroughly assess the potential for the proposal to affect nationally and internationally designated sites of nature conservation importance, including marine sites where relevant. European sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). In addition paragraph 181 of the National Planning Policy Framework (NPPF)

requires that potential SPAs, possible SAC, listed or proposed Ramsar sites, and any site identified or required as compensatory measures for adverse effects on habitat (European) sites, potential SPAs, possible SACs and listed or proposed Ramsar sites have the same protection as classified sites (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017 are defined as 'habitats sites' in the NPPF). Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically.

Should a likely significant effect on a European/Internationally designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process. Further guidance is set out in Planning Practice Guidance on appropriate assessment

<https://www.gov.uk/guidance/appropriate-assessment>

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

Nationally designated sites

The development site is within or may impact on the following **Site of Special Scientific Interest:**

- Kempton Park Reservoirs
- Thorpe Park No. 1 Gravel Pit
- Wraysbury No. 1 Gravel Pit
- Wraysbury Reservoir
- Wraysbury & Hythe End Gravel Pits
- Langham Pond
- Staines Moor

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 180 of the NPPF. Further information on the SSSI and its special interest features can be found at www.magic.gov.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geportal](#).

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature

reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.](#)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

The ES should use an appropriate biodiversity metric such as [Biodiversity Metric 3.0](#) together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 174 and 175 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.



Historic England

Mr Ed Laughton
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
UB8 1UW

Your Ref: 41573/APP/2023/3159
Our Ref: 217967

Contact: Sandy Kidd
02079733215
sandy.kidd@historicengland.org.uk

2023-12-11

Dear Mr Laughton,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021**

RUNWAYS EASTERLY INFRASTRUCTURE HEATHROW AIRPORT HOUNSLOW

Request for Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for Easterly Alternation Infrastructure project.

Scope Archaeology in to EIA

Thank you for your consultation received on 2023-11-21.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice in accordance with the National Planning Policy Framework and GLAAS Charter.

Heathrow Airport lies in the Heathrow Archaeological Priority Zone, an area of demonstrably high potential for prehistoric and Roman archaeology due to the presence of Neolithic ritual monuments, extensive Bronze Age field systems and settlements and later prehistoric and Roman settlement. Major excavations of regional and national significance have taken place in advance of the construction of Terminal 5. The applicant's scoping assessment indicates that some of the proposed works lie in areas where further archaeological remains may be



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HistoricEngland.org.uk



Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

For the Attention of: Ed Laughton

Site: RUNWAYS EASTERLY INFRASTRUCTURE HEATHROW AIRPORT HOUNSLOW

Proposal: Request for Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for Easterly Alternation Infrastructure project.

Application Reference: 41573/APP/2023/3159

National Highways Ref: NH/23/03842

Dear Ed,

Thank you for your consultation email dated 21st November 2023 regarding the above planning application.

National Highways (formally Highways England) has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways considers planning applications for new developments under the requirements of the National Planning Policy Framework (NPPF) and DfT Circular 01/2022: The Strategic Road Network and The Delivery of Sustainable Development ("the Circular"). The latter document sets out our policy on sustainable development and our approach to proposals which may have an impact on our network.

In proximity to the site, our interests relate to the operation and safety of the SRN i.e. the M4 Junctions 3, 4a, and 4, and the M25 Junctions 13, 14, and 15.

We have undertaken a review of the Environmental Impact Assessment (EIA) Scoping Report dated November 2023 (prepared by WSP UK Ltd (WSP) and Logika Group (Logika)).

National Highways does not offer an opinion on whether an EIA is required, as this is a matter for the Local Planning Authority. In the case of this proposed development, National Highways is interested in the potential impact it might have upon the M4 and M25, in particular whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of development. If an EIA is provided, we request that consideration is given to anything that may impact on the SRN in environmental terms, such as driver delay; accidents and safety; hazardous loads; and dust and dirt, etc.

Development Proposal

The proposal comprise infrastructure (including taxiways and hold areas) necessary to allow aircraft to efficiently and routinely use the northern runway for departures when the airport is on easterly operations. The proposals will not result in any changes to the operating hours of the airport and the annual cap of 480,000 Air Transport Movements

(ATMs), imposed on the airport as part of the planning permission for Terminal 5 will remain unchanged. Paragraph 5.4.36 of the Scoping Report states that ‘the proposed development is principally an operational change with limited physical development works’.

The Scoping Report identifies that the airport currently (Para 2.2.1) operates two parallel runways, the northern runway (Runway 09L/27R), and the southern runway (Runway 09R/27L) in segregated mode. This means that arriving aircrafts are assigned to one runway and departing aircraft to the other. The direction of arrivals and departures is dictated by the wind direction, as aircrafts depart and arrive into a headwind for aerodynamic and safety reasons.

The decision to end the Cranford Agreement by the Government in 2009 (preventing the use of the northern runway for departures in an easterly direction over Cranford) was based on the desire to distribute noise more fairly around the airport and extend the benefits of runway alternation to communities under the flight paths during periods of easterly winds (para 2.2.4). This change forms the basis of the current proposals.

The EIA identifies the extent of new airfield infrastructure works that are likely to be relatively limited, although the exact requirements are still being determined as part of an ongoing design process. At this stage, the infrastructure works are likely to comprise:

- Taxiways and links to comprise a hold area(s) at the western end of Runway 09L;
- New Runway Access Taxiway(s) (RATs) on Runway 09L;
- Other associated airfield works, e.g. new connector taxiways or crossing points;
- Areas of additional pavement may also be developed to enable aircraft to access and exit the runways, and;
- Changes to layout of aircraft stands (501 – 505) to the north of Terminal 5. There are no proposed changes to any of the road infrastructure surrounding the airport.

Construction

Paragraph 2.4.7 of the Scoping Report states that approximately 20 to 25 people will be required on site to complete the construction of the proposed development. There will however, be some additional HGV movements. The construction period is expected to be 18-24 months. A Construction Environmental Management Plan (CEMP) will be submitted to the LPA, when a contractor is appointed. The CEMP will include measures to control and mitigate the risk of adverse environmental effects arising from construction activities, and an outline CEMP will be submitted as part of the Environmental Statement.

A Construction Transport Management Plan (CTMP) will also be submitted to demonstrate that vehicle movements and any associated adverse effects are minimised. Paragraph 2.4.10 states that ‘the majority of Heavy Good Vehicles (HGVs) movements associated with the proposed development are likely to occur within or immediately surrounding the airport. This is in part due to the presence of the Colnbrook Logistics Centre and concrete batching and recycling facilities close to the airport, which would lead to limited traffic movements associated with the proposed construction activities. However, these details, including the preferred routes for HGV access will be set out within the supporting CTMP’.

As the airport would see no changes in operational vehicle trips, a Transport Assessment is not proposed, with all construction traffic impacts set out in the CTMP. With the M25 and the M4 being in close proximity to the airport, there may be other dust and debris concerns related to construction, etc. These will however be detailed in a future CEMP and CTMP.

National Highways would ask to be consulted on the CEMP and CTMP.

Traffic Impact

Paragraphs 12.4.5 and 12.4.6 of the Scoping Report state that '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. It is not anticipated that the increase in traffic flows will exceed 10% and thus effects on traffic and transport at the construction stage are scoped out of the detailed assessment. There will be no change to traffic numbers resulting from the implementation of the proposed development and for these reasons, there is no requirement for detailed Traffic and Transport assessment related to the proposed development'.

Our comments above imply no pre-determined view as to the acceptability of the proposed development in traffic, environmental, or highway terms. Should an EIA be required, we would review this document once provided.

Thank you for consulting with us, and if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at planningse@nationalhighways.co.uk.

Kind Regards,

Sammantha Rose MPlan
Assistant Spatial Planner

Operations Directorate – South East

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From: PlanningEConsult@Hillingdon.Gov.UK <PlanningEConsult@Hillingdon.Gov.UK>

Sent: Tuesday, November 21, 2023 3:33 PM

To: Planning SE <PlanningSE@highwaysengland.co.uk>

Subject: #21955 Planning Consultation for 41573/APP/2023/3159

LONDON BOROUGH OF HILLINGDON

NOTE: we now use an automated system to retrieve these replies, to respond to this consultation please **click the reply button** on the top of the tool bar, **do not change the subject line or e-mail address**, enter your comments and attach any associated documents you wish to submit and then click send.

Our Ref: **41573/APP/2023/3159**

Date: **21st November 2023**

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

RUNWAYS EASTERLY INFRASTRUCTURE HEATHROW AIRPORT HOUNSLOW

O.S.Sheet/s: Eastings: Northings:

Proposal: Request for Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for Easterly Alternation Infrastructure project.

Please find below details of the above-mentioned application which has been received by this Council.

We shall be pleased to receive any comments you may wish by **12 December 2023** and these will be taken into account when this Council determines the application.

To comment on this application please follow the instructions at the top of this email carefully.

Full details of the planning application, including the plans, can be viewed on the Council's web site

[Click here to view application](#)

From the date of receiving this letter it may take 2-3 days for the plans to be placed on the web site.

All enquiries about this application should be made to the case officer **Ed Laughton** on Tel: **01895 250230**.

Yours Faithfully

London Borough of Hillingdon Planning Services

Pconstat (ODB)

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expected to survive. However, the scale of the works is relatively localised and the character of archaeological remains relatively well understood.

I therefore agree with the proposed scoping in of archaeology in respect of the taxiways and other airport infrastructure groundworks.

I note that for a previous scheme of this nature (41573/APP/2013/1288) necessary archaeological mitigation was resisted by Heathrow Airports Ltd until a late stage in the appeal process. I would urge the applicant to reflect on that outcome and bring forward a scheme which allows for appropriate and practical mitigation.

I am concerned that the Longford acoustic barrier should not be scoped out at this early design stage and would prefer it to be covered by the archaeological assessment albeit that this may simply conclude that there is no impact or mitigation needed.

This response relates solely to archaeological issues.

Yours sincerely

Sandy Kidd

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

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Online Comment

31-01-24

Application Reference: 41573/APP/2023/3159
Site Location: RUNWAYS EASTERLY INFRASTRUCTURE
HEATHROW AIRPORT HOUNSLOW
Officer: Ed Laughton
Date Entered: 12-01-24
Date Transferred: 12-01-24
Consultee: The Ivers Parish Council
Address of Consultee:
Reference: OWPC108347

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Comments: The parish council request that ecological impact assessments are carried out at all non-statutory designated sites.
