



***EASTERLY ALTERNATION
INFRASTRUCTURE PROJECT***

***Environmental Impact Assessment
Environmental Statement, Volume II
Chapter 4: Legislative, Policy Context and Planning
History***

Document Reference: 19309-XX-EC-XXX-000010

October 2024

CONTENTS

4. Legislation, Policy Context and Planning History	4.1
4.1 Introduction.....	4.1
4.2 Legislation	4.1
4.3 Legal framework for the Environmental Statement	4.1
4.4 Environmental Statement	4.2
4.5 Outline of relevant policy documents.....	4.4
4.6 National planning policy.....	4.9
4.7 Relevant Aviation Policy/Strategy.....	4.11
4.8 Local Planning Policy	4.17
4.9 Heathrow Airport’s Planning History	4.22

Tables

Table 4.1 Additional authorities’ plans and policies considered.	4.6
Table 4.2 Policies relevant to the Proposed Development.	4.19
Table 4.3 Policies relevant to the Proposed Development from the HLP Part One and Part Two	4.19

4. Legislation, Policy Context and Planning History

4.1 Introduction

4.1.1 This Chapter of the Environmental Statement summarises the legislation and key policy context for the Proposed Development.

4.1.2 The legislation and policy outlined has been given due consideration during the preparation of this Environmental Statement. The environmental aspect chapters within the Environmental Statement (**Chapter 6** to **Chapter 12** of the Environmental Statement) include a summary of the relevant legislation and planning policies specific to that aspect at national, regional and local levels. This chapter should be read in conjunction with the **Planning Statement**.

4.2 Legislation

4.2.1 The Planning Application which this Environmental Statement supports must be considered in accordance with Section 70(2) of the Town and Country Planning Act 1990² and Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended)¹ which require that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Planning Application is for EIA development and so it must also be decided in accordance with the EIA Regulations 2017 (as amended)².

4.2.2 Legislation which is specific to aspects included in the EIA are set out in their respective technical Chapters.

4.3 Legal framework for the Environmental Statement

4.3.1 The EIA Regulations 2017² implement the requirements of EU Directive 2014/52/EU) and require that prior to consent being granted, for certain types of development, an EIA must be undertaken. The EIA Regulations 2017² set out the types of development which must always be subject to an EIA (Schedule 1 development) and other developments (Schedule 2 development) which require an assessment if they give rise to likely significant environmental effects by virtue of factors such as its nature, size or location.

4.3.2 The Proposed Development in this instance falls within Schedule 2, paragraph 10(e):

“*Construction of airfields*”, where the applicable screening thresholds and criteria are:

“(i) *The development involves an extension to a runway; or*

“(ii) *The area of the works exceeds 1 hectare*”.

4.3.3 In recognition that the Proposed Development meets the threshold (ii) above and that it has the potential to give rise to significant environmental effects by virtue of its nature, size and

¹ HM Government, (2004). *Planning and Compulsory Purchase Act 2004 (as amended)*. [online] Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Accessed: 02 October 2024].

location, the Applicant decided to commence the EIA process at an early stage without first requesting a Screening Opinion from the London Borough of Hillingdon (LBH) (where the Airport is located). The submission of this Environmental Statement in support of the Planning Application means that the Proposed Development is EIA development for the purposes of the EIA Regulations 2017² (see Regulations 5(1) and 5(2)(b)).

4.3.4 An EIA Scoping Report was submitted to the LBH on 01 November 2023 (**Appendix 1.5: Scoping Report**), together with a formal request for an EIA Scoping Opinion, in accordance with Regulation 15(1) of the EIA Regulations. A formal Scoping Opinion was subsequently received from LBH (February 2024), as included in **Appendix 1.6: Scoping Opinion**. Further details on the Scoping Opinion and how it has informed this Environmental Statement are provided in **Chapter 5: Approach to the EIA** and relevant technical **Chapters 6 to 12** of the Environmental Statement.

4.3.5 Scoping constitutes an important stage of the EIA process as it allows for the 'likely significant environmental effects' arising from a development, both adverse and beneficial, to be identified and agreed with the local planning authority, the statutory consultees and other stakeholders at an early stage. This process also ensures that the eventual Environmental Statement does not become unduly long, imbalanced or difficult for the reader to access key information. As such, peripheral issues ('non-significant effects') have either been scoped out of the Environmental Statement or are presented in a more concise form within it. This ensures that the Environmental Statement remains proportionate and focused on the main effects of the Proposed Development.

4.3.6 Regulation 18(4)(a) of the EIA Regulations 2017 states that where a Scoping Opinion has been adopted, the applicant's Environmental Statement should "*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)*".

4.3.7 Some evolution of the methodological approach between the scoping stage and submission of an application is to be expected. The Applicant has demonstrated how this Environmental Statement meets the requirements of Regulation 18(4)(a) in **Appendix 1.4: Location of Information within the Environmental Statement**.

4.4 Environmental Statement

4.4.1 Schedule 4 of the EIA Regulations 2017² provides details of the information required for inclusion in an Environmental Statement. Regulation 18(3) stipulates that Environmental Statements must include the following:

"A description of the likely significant effects of the development on the environment resulting from, inter alia:

(a) The construction and existence of the development, including, where relevant, demolition works;

(b) The use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;

(c) The emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;

(d) The risks to human health, cultural heritage or the environment (for example due to accidents or disasters);

(e) The cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;

(f) The impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;

(g) The technologies and the substances used.”²

4.4.2 Regulation 18(4) of the EIA Regulations 2017 requires that Environmental Statements must:

“(a) where a scoping opinion or direction has been issued in accordance with regulation 15 or 16, 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);

(b) include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment; and

(c) be prepared, taking into account the results of any relevant UK environmental assessment, which are reasonably available to the person preparing the environmental statement, with a view to avoiding duplication of assessment.”

4.4.3 Schedule 4 of the EIA Regulations further requires the Environmental Statement to provide:

“The description of the likely significant effects [including] direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development” and:

“A description of the reasonable alternatives (for example in terms of development design technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”²

4.4.4 This Environmental Statement contains the above details and draws primarily on information and material provided by the Applicant and its appointed consultant team.

² The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. [Online] Available at: <https://www.legislation.gov.uk/ukxi/2017/571/contents> [Accessed: 02 October 2024].

- 4.4.5 The inclusion of the information required by Regulation 18(3); Schedule 4 of the EIA Regulations 2017 is summarised in **Appendix 1.4: Location of Information within the Environmental Statement**.
- 4.4.6 The findings of the EIA are presented in this Environmental Statement which has been prepared in accordance with the EIA Regulations 2017 as well as planning practice guidance (PPG). The Environmental Statement is provided in four volumes:
- **Volume I: Non-Technical Summary;**
 - **Volume II: Main Environmental Statement;**
 - **Volume III: Technical Appendices;** and
 - **Volume IV: Noise Figures.**
- 4.4.7 **Chapter 1: Introduction** provides details of what is included in each of the volumes of the Environmental Statement.

4.5 Outline of relevant policy documents

- 4.5.1 Planning applications must be determined in accordance with the relevant Development Plan 'unless material considerations indicate otherwise' (Section 38(6) of the Planning and Compulsory Act 2004¹).
- 4.5.2 In the context of Section 38(6) of the Planning and Compulsory Act 2004, the following formally adopted documents have been reviewed owing to the location of the Proposed Development:
- The Hillingdon Local Plan (HLP)³: Part 1 – Strategic policies (2012), Part 2 – Development Management Policies (2020) and Part 2 – Site Allocations and Designations (2020); and
 - The London Plan (2021)⁴.
- 4.5.3 Additionally, the following documents have been reviewed and considered:
- Planning practice guidance⁵ (2024);

³ London Borough of Hillingdon (2024) *Local Plan*. [online] Available at: <https://www.hillingdon.gov.uk/local-plan-and-review> [Accessed: 02 October 2024].

⁴ Greater London Authority (2021) *The London Plan*. [online] Available at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf [Accessed: 02 October 2024].

⁵ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (2024) *Planning practice guidance*. [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Accessed: 02 October 2024].

- Decarbonising transport: a better greener Britain⁶ (2021); and
- National planning policy framework⁷ (2023).
- Aviation Policy:
 - Aviation Policy Framework (APF) (2013)⁸;
 - Airports National Policy Statement (2018)⁹;
 - Flightpath to the Future (2022)¹⁰;
 - Aviation Strategy 2050: The Future of UK Aviation (2018)¹¹;
 - Jet Zero Strategy: Delivering Net Zero Aviation by 2050 (JZSNZA) (2022)¹²; and
 - Overarching Aviation Noise Policy Statement (OANPS) (2023)¹³.

4.5.4 The Airport is also bordered by both the London Borough of Hounslow and Spelthorne Borough Council. In addition, as a result of the Airport location and that many aviation effects are wide ranging, other authorities also produce plans and policies which are of relevance and have therefore been considered, these are shown in **Table 4.1**.

⁶ Department for Transport (2021) *Decarbonising Transport: A Better, Greener Britain*. [online] Available at: <https://assets.publishing.service.gov.uk/media/610d63ffe90e0706d92fa282/decarbonising-transport-a-better-greener-britain.pdf> [Accessed: 02 October 2024].

⁷ Department for Levelling Up, Housing and Communities (2023) *National Planning Policy Framework*. [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf [Accessed: 02 October 2024].

⁸ Department for Transport, (2013). *Aviation policy framework*. [online] Available at: <https://www.gov.uk/government/publications/aviation-policy-framework> [Accessed: 02 October 2024].

⁹ Department for Transport, (2018). *Airports National Policy Statement*. [online] Available at: <https://www.gov.uk/government/publications/airports-national-policy-statement> [Accessed: 02 October 2024].

¹⁰ Department for Transport, (2022). *Flightpath to the Future*. [online] Available at: <https://assets.publishing.service.gov.uk/media/628f7d26e90e07039f799ebc/flightpath-to-the-future.pdf> [Accessed: 02 October 2024].

¹¹ Department for Transport, (2018). *Aviation 2050 — The Future of UK Aviation*. [online] Available at: https://www.bmaa.org/files/news_item_aviation-2050-consultation.pdf [Accessed: 02 October 2024].

¹² Department for Transport, (2022). *Jet Zero strategy: delivering net zero aviation by 2050*. [online] Available at: <https://www.gov.uk/government/publications/jet-zero-strategy-delivering-net-zero-aviation-by-2050> [Accessed: 02 October 2024].

¹³ Department for Transport, (2023). *Overarching Aviation Noise Policy Statement*. [online] Available at: <https://www.gov.uk/government/publications/aviation-noise-policy-statement/overarching-aviation-noise-policy> [Accessed: 02 October 2024].

Table 4.1 Additional authorities’ plans and policies considered.

Local Authority	Adopted local policy	Emerging local policy
London Borough of Hounslow	<ul style="list-style-type: none"> Local Plan Volumes One and Two¹⁴ West London Waste Plan (2015)¹⁵ London Plan (2021)⁴ 	<ul style="list-style-type: none"> Draft Local Plan (Regulation 18¹⁶) Proposed Approach (consolidates Volume 1, Volume 2, Volume 3 and Volume 4 emerging Development Plan Documents (DPDs)) (11 July 2023)
London Borough of Ealing	<p>The existing Development Plan¹⁷ for Ealing include the following documents (together with an associated Adopted Policies Map):</p> <ul style="list-style-type: none"> London Plan¹⁷ Development (or Core Strategy) DPD, April 2012¹⁷ Development Sites DPD, December 2013¹⁷ Development Management DPD, December 2013¹⁷ Joint West London Waste Plan, July 2015¹⁷ Planning for Schools DPD, May 2016¹⁷ 	<ul style="list-style-type: none"> Draft Local Plan (Regulation 19) (2022)¹⁸
London Borough of Richmond Upon Thames	<ul style="list-style-type: none"> The London Borough of Richmond upon Thames Local Plan 2018 - 2033¹⁹ London Plan 2021⁴ 	<ul style="list-style-type: none"> Local Plan Publication (Regulation 19) Consultation Version

¹⁴ London Borough of Hounslow, (2015). *Hounslow Local Plan (2015)*. [online] Available at: https://www.hounslow.gov.uk/info/20167/local_plan/1108/local_plan [Accessed: 02 October 2024].

¹⁵ London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond upon Thames and Old Oak and Park Royal Development Corporation, (2015). *West London Waste Plan*. [online] Available at: [West London Waste Plan \(richmond.gov.uk\)](https://www.richmond.gov.uk/info/20167/local_plan/1108/local_plan) [Accessed: 16 August 2024].

¹⁶ London Borough of Hounslow, (2023). *Local Plan Review: Regulation 18 Statement (Single Local Plan)*. [Online] Available at: [lbhounslow.sharepoint.com/sites/InternetLinks/pp/Shared Documents/Forms/AllItems.aspx?id=%2Fsites%2FInternetLinks%2Fpp%2FShared Documents%2FPlanning and Building %28WEBPAGES%29%2FPlanning Policy%2FLocal Plan%2FLocal Plan Review %28NEW%29%2F2%2E Local Plan Review – Regulation 18 Consultation on the Single Local Plan%2FLB Hounslow CLP Regulation 18 Statement FNL%2Epdf&parent=%2Fsites%2FInternetLinks%2Fpp%2FShared Documents%2FPlanning and Building %28WEBPAGES%29%2FPlanning Policy%2FLocal Plan%2FLocal Plan Review %28NEW%29%2F2%2E Local Plan Review – Regulation 18 Consultation on the Single Local Plan&p=true&ga=1&LOF=1](https://bhounslow.sharepoint.com/sites/InternetLinks/pp/Shared Documents/Forms/AllItems.aspx?id=%2Fsites%2FInternetLinks%2Fpp%2FShared Documents%2FPlanning and Building %28WEBPAGES%29%2FPlanning Policy%2FLocal Plan%2FLocal Plan Review %28NEW%29%2F2%2E Local Plan Review – Regulation 18 Consultation on the Single Local Plan%2FLB Hounslow CLP Regulation 18 Statement FNL%2Epdf&parent=%2Fsites%2FInternetLinks%2Fpp%2FShared Documents%2FPlanning and Building %28WEBPAGES%29%2FPlanning Policy%2FLocal Plan%2FLocal Plan Review %28NEW%29%2F2%2E Local Plan Review – Regulation 18 Consultation on the Single Local Plan&p=true&ga=1&LOF=1) [Accessed 02 October 2024].

¹⁷ London Borough of Ealing, (n.d.). *Development plan*. [online]. Available at: https://www.ealing.gov.uk/info/201162/planning_policy/3124/development_plan [Accessed 15 August 2024].

¹⁸ London Borough of Ealing, (2024). *Ealing’s Draft Local Plan (Regulation 19 Consultation Documents)*. [online] Available at: <https://ealing.moderngov.co.uk/documents/g6325/Public%20reports%20pack%20Wednesday%2028-Feb-2024%20Ealings%20Draft%20Local%20Plan%20Regulation%2019%20Consultation%20D.pdf?T=10> [Accessed: 02 October 2024].

¹⁹ London Borough of Richmond upon Thames, (2018). *Local Plan*. [online] Available at: https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf [Accessed: 02 October 2024].

Local Authority	Adopted local policy	Emerging local policy
		(including changes to the Policies Map designations) (June 2023) ²⁰
Slough Borough Council	<ul style="list-style-type: none"> • Core Strategy DPD (2008)²¹ • Site Allocations DPD (2010)²² • Local Plan Saved Policies (2004)²³ • Waste Local Plan for Berkshire (1998)²⁴ • Proposals Map (2010)²⁵ 	<ul style="list-style-type: none"> • Draft Proposed Spatial Strategy Regulation 18 Consultation (2020)²⁶
Buckinghamshire Council	<ul style="list-style-type: none"> • Vale of Aylesbury Local Plan 2013-2033 (2021)²⁷ • Chiltern District Local Plan (adopted 1997 including alterations adopted 2001) (consolidated 2007 and 2011)²⁸ • South Bucks District Local Plan (1999) (consolidated 2007 and 2011)²⁹ 	Not applicable

²⁰ London Borough of Richmond upon Thames, (2023). *Local Plan: Publication Local Plan*. [online] Available at: https://richmond.gov.uk/draft_local_plan_publication_version [Accessed: 02 October 2024].

²¹ Slough Borough Council, (2008). *Core Strategy Development Plan Document*. [online] Available at: <https://www.slough.gov.uk/downloads/file/2273/development-plan-core-strategy-2006-2026> [Accessed: 02 October 2024].

²² Slough Borough Council, (2010). *Site Allocations Development Plan Document*. [online] Available at: <https://www.slough.gov.uk/downloads/file/2274/development-plan-site-allocations> [Accessed: 02 October 2024].

²³ Slough Borough Council, (2004). *Slough Local Plan (2004) Saved Policies*. [online] Available at: <https://www.slough.gov.uk/downloads/download/139/slough-local-plan-2004-saved-policies> [Accessed: 02 October 2024].

²⁴ Babtie Group, (1998). *Waste Local Plan for Berkshire*. [online] Available at: <https://www.slough.gov.uk/downloads/file/2805/berkshire-joint-waste-local-plan-1998> [Accessed: 02 October 2024].

²⁵ Slough Borough Council, (2010). *Proposal Map*. [online] Available at: <https://www.slough.gov.uk/downloads/download/16/local-plan> [Accessed: 02 October 2024].

²⁶ Slough Borough Council (2020) *The Proposed Spatial Strategy*. [online] Available at: <https://www.slough.gov.uk/downloads/file/344/the-spatial-strategy-consultation-document-nov-2020> [Accessed: 02 October 2024].

²⁷ Buckinghamshire Council (2021) *Vale of Aylesbury Local Plan (VALP)*. [online] Available at: https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Aylesbury_local_plan_L46JWaT.pdf [Accessed: 02 October 2024].

²⁸ Chiltern District Council (2011) *Chiltern District Local Plan*. [online] Available at: https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Chiltern_local_plan_sNdNTQD.pdf [Accessed: 02 October 2024].

²⁹ South Bucks District Council (2011) *South Bucks District Local Plan*. [online] Available at: https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/South_Bucks_local_plan_j4D6YG4.pdf [Accessed: 02 October 2024].

Local Authority	Adopted local policy	Emerging local policy
	<ul style="list-style-type: none"> • South Bucks Core Strategy (2011)³⁰ • Wycombe District Local Plan (2019)³¹ • Wycombe Adopted Delivery and Site Allocations Plan (2013)³² • Buckinghamshire Minerals and Waste Local Plan 2016-2036 (2019)³³ 	
Royal Borough of Windsor and Maidenhead Councils	<ul style="list-style-type: none"> • The Borough Local Plan 2013-2033 (2022)³⁴ • Joint Central and Eastern Berkshire Minerals & Waste Plan (adopted November 2022)³⁵ • Saved South East Plan Policy NRM6: Thames Basin Heaths Special Protection Area (SPA) (2009)³⁶ 	Not applicable
Spelthorne Borough Council	<ul style="list-style-type: none"> • Core Strategy and Policies DPD (2009)³⁷ 	<ul style="list-style-type: none"> • Pre-submission Spelthorne Local Plan 2022 - 2037 (Regulation 19) and Staines Development Framework (2022)³⁸

³⁰ South Bucks District Council (2011) *South Bucks Core Strategy*. [online] Available at: [https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/South Bucks Core Strategy - Adopted February 2011 bb48FA7.pdf](https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/South_Bucks_Core_Strategy_-_Adopted_February_2011_bb48FA7.pdf) [Accessed: 02 October 2024].

³¹ Wycombe District Council (2019) *Wycombe District Local Plan*. [online] Available at: <https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Wycombe-District-Local-Plan-Adopted-August-2019-accessible.pdf> [Accessed: 02 October 2024].

³² Wycombe District Council (2013) *Adopted Delivery and Site Allocations Plan*. [online] Available at: https://buckinghamshire-gov-uk.s3.eu-west-1.amazonaws.com/documents/Adopted-delivery-and-site-allocations-plan_kf70Oeo.pdf [Accessed: 02 October 2024].

³³ Buckinghamshire County Council (2019) *Buckinghamshire Minerals and Waste Local Plan*. [online] Available at: https://buckinghamshire-gov-uk.s3.eu-west-1.amazonaws.com/documents/buckinghamshire-minerals-and-waste-local-plan-2016-2036_yiYUGSb.pdf [Accessed: 02 October 2024].

³⁴ Royal Borough of Windsor and Maidenhead (2022) *Borough Local Plan*. [online] Available at: <https://www.rbwm.gov.uk/home/planning-and-building-control/planning-policy/development-plan/adopted-local-plan> [Accessed: 02 October 2024].

³⁵ Hampshire County Council (2019) *Joint Minerals & Waste Plan*. [online] Available at: <https://www.rbwm.gov.uk/home/planning-and-building-control/planning-policy/development-plan/minerals-and-waste-plans> [Accessed: 02 October 2024].

³⁶ Royal Borough of Windsor and Maidenhead (2010) *Thames Basin Heaths Special Protection Area Supplementary Planning Document (Part 1)*. [online] Available at: https://www.rbwm.gov.uk/sites/default/files/2024-06/pp_spa_spd_document.pdf [Accessed: 18 June 2024].

³⁷ Spelthorne Borough Council (2009) *Core Strategy and Policies Development Plan Document*. [online] Available at: <https://www.spelthorne.gov.uk/article/17620/Development-Plan-2009> [Accessed: 02 October 2024].

³⁸ Spelthorne Borough Council (2022) *Emerging Local Plan 2022-2037*. [online] Available at: <https://www.spelthorne.gov.uk/article/17619/Emerging-Local-Plan-2022-2037> [Accessed: 02 October 2024].

Local Authority	Adopted local policy	Emerging local policy
Runnymede Borough Council	<ul style="list-style-type: none"> Runnymede 2030 Local Plan (2020)³⁹ Saved South East Plan Policy NRM6: Thames Basin Heaths SPA (2009)⁴⁰ 	Not applicable

4.6 National planning policy

National Planning Policy Framework (2023)

4.6.1 The revised National Planning Policy Framework (NPPF) (2023)⁷ sets out the UK Government’s planning policies and is a material consideration in determining planning applications. The NPPF sets out a presumption in favour of sustainable development through plan making and decision taking with paragraph 11 stating:

“11. Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay...”

“85. Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴⁴, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential...”

⁴⁴ The Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility; and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future”

“87. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

- (a) clusters or networks of knowledge and data-driven, creative, or high technology industries; and for*
- (b) storage and distribution operations at a variety of scales and in suitably accessible locations.”*

³⁹ Runnymede Borough Council (2020) *Runnymede 2030 Local Plan*. [online] Available at: <https://www.runnymede.gov.uk/downloads/file/781/adopted-2030-lp> [Accessed: 02 October 2024].

⁴⁰ Runnymede Borough Council (2021) *Thames Basin Heaths Special Protection Area Supplementary Planning Document (SPD)*. [online] Available at: <https://www.runnymede.gov.uk/downloads/file/830/protection-area> [Accessed: 02 October 2024].

“110. Planning policies should:

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy⁴⁷

⁴⁷ Department for Transport (2015) General Aviation Strategy.”

- 4.6.2 Paragraph 194 sets out that Local Planning Authorities should decide planning applications on whether they are suitable use of land and trust separate pollution control regimes to safeguard the operation of facilities which occupy that land. It states:

“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.”

- 4.6.3 The Ministry of Housing, Communities and Local Government released a Draft National Planning Policy Framework⁴¹ for consultation in July 2024. While this review is undertaken the current NPPF⁷ remains relevant UK Government policy and, therefore the extant NPPF continues to have effect.

Planning Practice Guidance (2014 (updated 2024))

- 4.6.4 PPG⁵ was first published by the Department for Levelling Up, Housing and Communities and the Ministry of Housing, Communities and Local Government in 2014 and is maintained as a live online resource. The PPG provides guidance to support the implementation of the NPPF⁷ and, as such, they should be read in conjunction with each other. The PPG covers a broad range of areas relevant to the EIA, including EIA practice, noise, air quality, climate change, and others.

Decarbonising transport: a better, greener Britain (2021)

- 4.6.5 The Decarbonising Transport: A Better, Greener Britain (DTABGB)⁶ was published by the DfT in 2021. The DTABGB details the UK Government’s overall commitments and intended actions that are required to decarbonise the UK’s entire transport system.

⁴¹ Ministry of Housing, Communities and Local Government, (2024). *DRAFT National Planning Policy Framework*. [Online] Available at: https://assets.publishing.service.gov.uk/media/66acffdce1fd0da7b593274/NPPF_with_footnotes.pdf [Accessed: 02 October 2024].

- 4.6.6 In July 2022, the Decarbonising Transport: one-year-on-review⁴² was published which summarised the UK Government's progress since the DTABGB emerged as well as projecting future milestones.

4.7 Relevant Aviation Policy/Strategy

Aviation Policy Framework (2013)

- 4.7.1 The APF⁸ was published in March 2013 by the DfT. The APF sets out the UK Government's objectives and policies relating to aviation. It makes reference to "*making best use of existing capacity to improve performance, resilience and the passenger experience*" (paragraph 1.60).
- 4.7.2 Paragraph 1.63 of the APF confirms the UK Government's policy decision to end the Cranford Agreement and explains the reasons for that decision:
- "To further improve operations and resilience at Heathrow we confirmed the ending of the Cranford agreement. This is an informal but long-standing agreement not to use the northern runway for departures when the wind was in from the east (roughly 30% of the time). This decision needs to be implemented by Heathrow Airport Ltd and a planning application will shortly be submitted for the necessary changes to airport infrastructure. Following implementation, noise will be distributed more fairly around the airport, extending the benefits of runway alternation to communities under the flight paths during periods of easterly winds, and delivering operational benefits by letting the airport operate consistently whether there are easterly or westerly winds."*
- 4.7.3 The APF forms a sustainable framework for the industry and as such it supports the growth of aviation as a sector as well as its wider connectivity, as well as recognising the climate change, noise and other environmental impacts associated with this industry.
- 4.7.4 The APF recognises the economic strategic importance of Heathrow and states that as such, it is "*appropriate for the Government to take decisions on the right balance between noise controls and economic benefits, reconciling the local and national strategic interests*" (paragraph 3.10).
- 4.7.5 The APF also sets out the UK Government's expectation for Airports to make efforts to mitigate expected adverse noise impacts on communities when bringing forward proposals to change operational procedures. The APF gives particular weight to noise mitigation over other environmental impacts and states that "*in these cases, it would be appropriate to consider new and innovative approaches such as noise envelopes or provision of respite for communities already affected*" (paragraph 3.28).

⁴² Department for Transport, (2022). *Decarbonising transport: one-year-on review*. [online] Available at: <https://www.gov.uk/government/publications/decarbonising-transport-one-year-on-review> [Accessed: 02 October 2024].

Noise Policy Statement for England (2010)

- 4.7.6 The Noise Policy Statement for England (NPSE)⁴³ was published on 15 March 2010. It sets out the long-term vision of UK Government noise policy, including commitment to sustainable development and to promote good health and a good quality of life through the management of noise.
- 4.7.7 The aim of the NPSE document is to provide clarity regarding current policies and practices to enable noise management decisions to be made within the wider context, at the most appropriate level, in a cost-effective manner and in a timely fashion. The document sets out a long-term vision supported by the following aims in paragraph 1.7 to achieve:
- “the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:*
- *Avoid significant adverse impacts on health and quality of life;*
 - *Mitigate and minimise adverse impacts on health and quality of life; and*
 - *Where possible, contribute to the improvement of health and quality of life.”*
- 4.7.8 The NPSE seeks to clarify the underlying principles and aims in existing policy documents, legislation and guidance that relate to noise. It has been developed following discussions with stakeholders regarding the effects on the noise environment of current policies and practices.

Airports National Policy Statement (2018)

- 4.7.9 The Airports National Policy Statement (ANPS)⁹ was published by the Secretary of State for Transport in June 2018. It details the need for additional hub airport capacity in the south east of England and identified a new north west runway at the Airport as the most effective and appropriate way of meeting that need. Whilst it specifically provides guidance for the determination on development consent order applications and in particular, relating to a north west runway at the Airport, it can be a material consideration with regards to applications for other Airport development in the south east of England.
- 4.7.10 The ANPS⁹ forms part of the overall framework of national policy, and although the Proposed Development is not a nationally significant infrastructure project, it is important to consider the proposals in the context of national aviation policy and can be a material consideration when considering an application submitted under the Town and Country Planning Act 1990.
- 4.7.11 The ANPS sets out the need for communities to experience predictable periods of respite from aircraft noise, in the interest of their health. Paragraph 5.56 states:

⁴³ Department for Environment, Food and Rural Affairs (2010) *Noise Policy Statement for England*. [online] Available at: <https://www.gov.uk/government/publications/noise-policy-statement-for-england> [Accessed: 02 October 2024].

“The Government also recognises that predictable periods of relief from aircraft noise (known as respite) are important for communities affected, and that noise at night is widely regarded as the least acceptable aspect of aviation noise for those communities, with the costs on communities of aircraft noise during the night (particularly the health costs associated with sleep disturbance) being higher.”

- 4.7.12 The ANPS qualifies this further by suggesting that Airports should make efforts to alternate their runways in order to provide such respite periods. Paragraph 5.61 relates to proposals for a North West runway at Heathrow but its explicit support for respite is notable:

“The applicant should put forward plans for a runway alternation scheme that provides communities affected with predictable periods of respite (though the Government acknowledges that the duration of periods of respite that currently apply will be reduced). Predictability should be afforded to the extent that this is within the airport operator’s control.”

Beyond the Horizon: Making Best Use of Existing Runways (June 2018)

- 4.7.13 The Beyond the Horizon: Making Best Use of Existing Runways document⁴⁴ was published by the DfT in 2018 and it states the policy support for all Airports to be resilient and to make the ‘best use (MBU) of their existing runways’ so long as the environmental effects are managed.
- 4.7.14 There is therefore a support in principle for investment in Airports to make best use of their existing infrastructure, provided that they address environmental and climate change issues.

Aviation Strategy 2050: The Future of UK Aviation (2018)

- 4.7.15 The Aviation Strategy 2050: The Future of UK Aviation (Aviation Strategy)¹¹ consultation was undertaken by the DfT in December 2018. Its conclusion sets out the challenges and opportunities for the aviation industry to 2050 and specifically emphasises the significance of aviation to the UK’s economy. Overall, the Aviation Strategy has various overriding strategic aims, however that of most relevance to this Proposed Development aim to build the industry sustainability by meeting rising demand whilst balancing environmental and community impacts.
- 4.7.16 These policy proposals remain an important cross reference for the direction of long-term aviation policy. This Aviation Strategy is founded on the important economic role of aviation and states:

⁴⁴ Department for Transport, (2018). *Beyond the horizon: The future of UK aviation. Making best use of existing runways.* [online] Available at: <https://assets.publishing.service.gov.uk/media/5b16b68d40f0b634b469fa35/making-best-use-of-existing-runways.pdf> [Accessed: 02 October 2024].

“Aviation has long been at the heart of the United Kingdom’s economic success” and “A thriving aviation sector is tangible evidence of economic confidence, growing tourism, increased trade, and business investment.”⁴⁵

Flightpath to the Future (2022)

4.7.17 In May 2022, the Flightpath to the Future Strategy¹⁰ was published by the DfT to set out a framework for aviation over the next ten years. The key objective of the strategy is to promote the recovery of the aviation industry as well as modernise, innovate, and decarbonise the industry moving forward.

4.7.18 The strategy sets out a ten-point plan for the future of UK aviation setting out the key themes of the strategy. These include the following:

“Enhancing global impact for a sustainable recovery

1. *Recover, learn lessons from the pandemic and sustainably grow the sector.*
2. *Enhance the UK’s global aviation impact and leadership.*
3. *Support growth in airport capacity where it is justified, ensuring that capacity is used in a way that delivers for the UK.*

Embracing innovation for a sustainable future

4. *Put the sector on course to achieve Jet Zero by 2050 – this will include delivering on our aspiration for zero emission flights across the UK this decade.*
5. *Capture the potential of new technology and its uses.*

Realising benefits for the UK

6. *Unlock local benefits and level up – recognise how our extensive airport, airfield, and aviation infrastructure network acts as a catalyst for national and local benefits.*
7. *Unleash the potential of the next generation of aviation professionals – enhance skills and diversity across the entirety of the sector.*
8. *Make the UK the best place in the world for General Aviation – recognise the important role General Aviation plays in providing domestic and international connectivity for a range of areas.*

Delivering for users

9. *Improve the consumer experience – build consumer confidence, make aviation accessible and inclusive for all, and facilitate a smooth border experience.*
10. *Retain our world-leading record on security and safety with a world-leading regulator.”*

⁴⁵ Ibid, Foreword.

Jet Zero Strategy: Delivering Net Zero Aviation by 2050 (2022)

- 4.7.19 The Jet Zero: Strategy for Net Zero Aviation by 2050 (JZSNZA)¹² was published on the 19 July 2022 by the DfT and was later updated on 02 August 2022 and again on 20 July 2023 in Jet Zero Strategy: One Year On⁴⁶. The JZSNZA sets out how the UK's aviation industry will achieve net zero emissions by 2050, with a focus on rapidly developing technologies whilst ensuring opportunities from decarbonisation are maximised. These outcomes will be achieved alongside the ANPS policies set out in this Section (**paragraph 4.7.9 to 4.7.12**). The UK Government has introduced targets for a carbon dioxide (CO₂) emissions reduction trajectory that would mean aviation emissions peaked in 2019. From 2025 to 2050, the trajectory aims for a reduction in aviation emissions of 35.4 metric tons of carbon dioxide-equivalent (MtCO₂e) in 2030, 28.4 MtCO₂e in 2040 and 19.3 MtCO₂e in 2050.
- 4.7.20 The UK Government have committed to monitoring aviation emissions against their trajectory annually from 2025 and will review the overall trajectory as part of the 5-year review, starting in 2027.

Overarching Aviation Noise Policy Statement (2023)

- 4.7.21 The Overarching Aviation Noise Policy Statement (OANPS)¹³ was published on 27 March 2023. The publication of the OANPS supported the night-time noise abatement objective consultation whilst providing clarity for both Airports and their stakeholders when preparing or responding to noise action plan consultations.
- 4.7.22 The OANPS sets out the UK Government's revised overarching aviation noise policy relating to aviation, as follows:

"The government's overall policy on aviation noise is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation's Balanced Approach to Aircraft Noise Management. This should take into account the local and national context of both passenger and freight operations, and recognise the additional health impacts of night flights.

The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise."

- 4.7.23 The OANPS also refers to a previous consultation, as part of Aviation 2050, on setting a new objective *"to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise"*. This was to bring national aviation noise policy in line with airspace policy updated in 2017. In that context, the OANPS explains:

"We consider that "limit, and where possible reduce" remains appropriate wording. An overall reduction in total adverse effects is desirable, but in the context of

⁴⁶ Department for Transport (2023) *Jet Zero Strategy: One Year On*. [online] Available at: <https://assets.publishing.service.gov.uk/media/64c2463b331a650014934cb0/jet-zero-strategy-one-year-on.pdf> [Accessed: 02 October 2024].

sustainable growth an increase in total adverse effects may be offset by an increase in economic and consumer benefits. In circumstances where there is an increase in total adverse effects, “limit” would mean to mitigate and minimise adverse effects, in line with the Noise Policy Statement for England.”

Summary

- 4.7.24 Consistent key priorities of national aviation policy are to make best use of existing runway capacity, creation of economic benefits and ensuring predictable period of respite for local communities. These are included in the APF 2023 (**paragraph 4.7.1**) and subsequent aviation policy documents.
- 4.7.25 Paragraph 1.7 of NPSE⁴³ (**paragraph 4.7.6**) sets out a requirement for airports to consider their environmental footprint in the context of sustainable development by ensuring that they manage and control noise in their neighbourhoods, in the interest of safeguarding and improving communities’ quality of life. Paragraph 2.18 of NPSE outlines that it is necessary to take the economic and social benefits of the activity into account alongside the adverse environmental effects, including on health and quality of life, thereby avoiding the issue of noise being considered in isolation.
- 4.7.26 This is reinforced by the UK Government clarifying that airports should make reasonable efforts to provide predictable periods of respite from aircraft noise for communities that neighbour them. These requirements are set out in the APF and in paragraph 5.56 and 5.61 of the ANPS (**paragraph 4.7.9**).
- 4.7.27 This application requests that in accordance with paragraph 194 of the NPPF⁷, the Applicant is able to undertake the necessary steps to implement measures which concur with the policies stated in this Section (**paragraph 4.5.2**). It should also be noted that Jet Zero (**paragraph 4.7.19**) sets out that the UK Government are responsible for reducing aviation emissions in the UK, not individual airports.
- 4.7.28 The UK Government has reaffirmed this position in a number of documents published in 2022/2023, namely: Flightpath to the Future¹⁰ (26 May 2022) which is the UK Government’s strategic framework for the aviation sector; Jet Zero Consultation: Summary of responses to the Jet Zero consultation⁴⁷ (19 July 2022); and the Jet Zero Strategy¹² itself (19 July 2022).
- 4.7.29 The UK Government response to the Jet Zero consultation⁴⁷ and further technical consultation stated explicitly that the ANPS⁹ and Beyond the Horizon, the future of UK aviation: Making best use of existing runways (‘MBU’)⁴⁴: *“Provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria”*¹².

⁴⁷ Department for Transport, (2022). *Jet Zero Consultation: Summary of responses and government response*. [online] Available at: <https://assets.publishing.service.gov.uk/media/62d5b0af8fa8f50bfbe58d/jet-zero-consultation-summary-of-responses-and-government-response.pdf> [Accessed: 02 October 2024].

4.8 Local Planning Policy

4.8.1 The location of the Proposed Development falls within the administrative boundary of the LBH, as such its policies have been reviewed within the context of the Proposed Development. Additionally, the London Plan 2021 (**paragraph 4.8.2**) has also been reviewed in relation to the Proposed Development where appropriate.

Greater London Authority: London Plan 2021

4.8.2 The London Plan 2021⁴ represents the Spatial Development Strategy for Greater London and projects London's development over the next 25 years. It forms part of the statutory development plan for Greater London and the LBH. It guides the determination of planning applications across by councils and the Mayor of London and forms the basis of Local Plan development across London.

4.8.3 The following policies are relevant to the Proposed Development:

- **Policy D14 – Noise** which aims to reduce, manage, and mitigate noise to improve overall health and quality of life whilst listing ways in which a development should manage noise.
- **Policy SI 1 – Improving Air Quality** lists the criteria which should be addressed in order to tackle poor air quality, protect health, and meet the legal obligations relevant to air quality. Developments must also demonstrate their impacts on air quality during construction and demolition through a Non-Road Mobile Machinery Low Emission Zone and by following best practice guidelines.
- **Policy SI 2 – Minimising Greenhouse Gas Emissions** emphasises the importance of reducing greenhouse gas (GHG) emissions noting that carbon emissions should be minimised during all aspects for the development.
- **Policy T8 – Aviation** stipulates that environmental and health impacts must be fully considered and mitigated, specifically with respect to noise, air quality and climate change whilst noting that developments should make better use of existing Airport capacity.

The Hillingdon Local Plan 2012 and 2020

4.8.4 The HLP³ is the key strategic planning document for Hillingdon and it was adopted in 2012.

4.8.5 The HLP Part One Strategic Policies⁴⁸ details the long-term spatial vision and objectives for the LBH, detailing the broad policies which aim to guide and shape development. The HLP Part One aligns with the Sustainable Community Strategy which aligns Place and Prosperity at the core of its strategy.

⁴⁸ London Borough of Hillingdon, (2012). *Hillingdon Local Plan: Part 1 – Strategic Policies*. [online] Available at: [https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/npLocal Plan Part 1 Strategic Policies 15 feb 2013 a 1 1.pdf?m=1598370401647](https://www.hillingdon.gov.uk/media/3080/Local-Plan-Part-1---Strategic-Policies/pdf/npLocal%20Plan%20Part%201%20Strategic%20Policies%2015%20feb%202013%20a%201%201.pdf?m=1598370401647) [Accessed: 02 October 2024].

- 4.8.6 The HLP Part Two Development Management Policies⁴⁹ was adopted in January 2020 and provides detailed policies that form the basis of and guide the LBH decisions with regards to planning applications.
- 4.8.7 On the 27 September 2007, the LBH specified policies that were retained from the Unitary Development Plan⁵⁰ (UDP). As such, saved policies from Hillingdon's UDP have been gradually superseded by policies from HLP documents. Therefore, the relevant policies from both Part One and Two of the HLP are detailed in **Table 4.2** below and will be taken into account with regards to the progression, scoping and design of the Proposed Development.
- 4.8.8 LBH is preparing for a partial review of the HLP to combine the two Parts of the Local Plan, which will cover the period 2023 to 2038. The review will conclude with the adoption of a revised Local Plan; however, the emerging new Local Plan is at an early stage of preparation. As part of the Local Plan review evidence gathering, LBH launched a Regulation 18 consultation in April 2024 entitled 'call for views' which ended on 24 June 2024. This marks an early stage in the plan preparation and the emerging plan carries no weight at this stage. The next stage will comprise consultation on the proposed submission of the Local Plan in early 2025. While this review is undertaken the adopted HLP continues to be in effect.
- 4.8.9 The HLP Part Two Site Allocations and Designations⁵¹ adopted in January 2020 amended the Green Belt boundary in the vicinity of the Terminal 5 Pod car park at 470 Bath Road and Longford Green as it was deemed that "*both sites do not merit their current Green Belt designation*" (please see the **Planning Statement** for further information).
- 4.8.10 **Table 4.2** lists policy guidance and policies relevant to the Proposed Development.

⁴⁹ London Borough of Hillingdon (2020) *Hillingdon Local Plan Part 2: Development Management Policies*. [online] Available at: https://www.hillingdon.gov.uk/media/3084/Hillingdon-Local-Plan-Part-2-Development-Management-Policies/pdf/pdLPP2_Development_Management_Policies_-_ADOPTED_VERSION_JAN_2020_1.pdf?m=1598370641570 [Accessed: 02 October 2024].

⁵⁰ London Borough of Hillingdon (1994) *Unitary Development Plan (adopted 1998) Saved Policies 27th September 2007*.

⁵¹ London Borough of Hillingdon (2020) *Hillingdon Local Plan Part 2: Site Allocations and Designations*. [online] Available at: <https://www.hillingdon.gov.uk/local-plan-and-review> [Accessed: 02 October 2024].

Table 4.2 Policies relevant to the Proposed Development.

Policy	Policy summary
HLP Part One Strategic Objective 25⁴⁸	Aims to maintain support for operational uses that do not increase environmental impacts within the Airport’s existing boundary.
HLP Part One Policy E3⁴⁸	Aims to manage development and protect land within the Applicant’s boundaries for Airport-related activities through the Local Development Document for the Heathrow Area. Which ensures local people benefit from sustainable economic growth located both within the Airport boundaries and in the Perimeter areas.
HLP Part One Policy T4⁴⁸	Recognises the economic importance of the Airport and aims to support the sustainable operation of the Airport within its present boundaries and growth in the Heathrow Opportunity Area by encouraging improvements to public transport and cycle links, enhancing the public transport whilst improving environmental conditions.
HLP Part Two Policy DMAV 2⁴⁹	Encourages proposals within the Airport boundary which directly relate to Airport development, where there is no detrimental impact to the safe and efficient operation of local transport networks or the environment. Additionally, such proposal will be supported where they demonstrate compliance with DMEI 14 and will require an EIA and the identification of mitigation measures.

4.8.11 **Table 4.3** lists policies relevant to the assessment of effects that need to be considered when determining the scope of this assessment.

Table 4.3 Policies relevant to the Proposed Development from the HLP Part One and Part Two

Aspect	Policy summary
Health & Equalities	
HLP Part One Strategic Objective SO6⁴⁸	To ensure an equitable distribution of opportunity and equality of access relating to social, educational, health, employment, recreational, green space, and cultural facilities across the Borough.
Carbon & Climate	
HLP Part One Policy EM1: Climate Change Adaptation and Mitigation⁴⁸	To ensure climate change mitigation is addressed.
HLP Part Two DMEI 2: Reducing Carbon Emissions⁴⁹	Minimising carbon dioxide emissions in line with London Plan (paragraph 4.8.2) targets.
Air Quality	

Aspect	Policy summary
HLP Part One Policy EM8: Land, Water, Air and Noise⁴⁸	To ensure local air quality does not deteriorate.
HLP Part Two Policy DMEI 14: Air Quality⁴⁹	To ensure that developments, as a minimum, be at least “air quality neutral”, include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors and actively contribute to the improvement of air quality, especially within Air Quality Management Areas.
Noise & Vibration	
HLP Part One Policy EM8: Land, Water, Air and Noise⁴⁸	To ensure that noise generating development are adequately controlled and mitigated.
Historic Environment	
HLP Part One Policy HE1: Heritage⁴⁸	To ensure the conservation and enhancement of heritage relevant to the Borough’s historic environment, including historic village cores, designate heritage assets, locally listed buildings and archaeologically significant areas.
HLP Part Two Policy DMHB 1: Heritage Assets⁴⁹	To ensure that harm to the historic environment is prevented.
HLP Part Two Policy DMHB 2: Listed Buildings⁴⁹	Ensures that substantial harm to or total loss of significance of a statutory Listed Building only occurs in exceptional circumstances.
HLP Part Two Policy DMHB 3: Locally Listed Buildings⁴⁹	Presumption in favour of the retention of Locally Listed Buildings.
HLP Part Two Policy DMHB 7: Archaeological Priority Areas and Archaeological Priority Zones⁴⁹	Archaeological Priority Areas, Archaeological Priority Zones and requirements for archaeological investigation and recording. Provides To ensure that archaeological remains within areas designated as Archaeological Priority Areas should not be disturbed.
HLP Part Two Policy DMHB 8: Registered Historic Parks, Gardens and Landscapes⁴⁹	To ensure the special character, environmental quality, views and vistas of Registered Historic Parks, Gardens and Landscapes are preserved.
Landscape and Visual	
HLP Part One Policy EM2: Green Belt, Metropolitan Open Land and Green Chains⁴⁸	To preserve Green Belt setting and character, particularly the extent, hierarchy and strategic functions.

Aspect	Policy summary
HLP Part Two Policy DMEI 4: Development in the Green Belt or on Metropolitan Open Land⁴⁹	Outlines permitted Green Belt development relating to the visual amenity and character of the Green Belt and Metropolitan Open Land
Biodiversity	
HLP Part One Policy EM1: Climate Change Adaptation and Mitigation⁴⁸	To ensure climate change mitigation is addressed.
HLP Part One Policy EM7: Biodiversity and Geological Conservation⁴⁸	To ensure that biodiversity and geodiversity value of Sites of Importance for Nature Conservation will be protected and enhanced.
HLP Part Two Policy DMEI 7: Biodiversity Protection and Enhancement⁴⁹	To ensure any features of biodiversity or geological value within the site are retained and enhanced.
Water Environment	
HLP Part One Policy EM1: Climate Change Adaptation and Mitigation⁴⁸	To ensure climate change mitigation is addressed and requiring a consideration of the whole water cycle effects including flood risk management, foul and surface water drainage, and water consumption.
HLP Part One Policy EM6: Flood Risk Management⁴⁸	To ensure development is directed away from Flood Zones 2 and 3 in accordance with the NPPF (paragraph 4.6.1). Encourages the use of Sustainable Drainage Systems unless demonstrated that it is not viable.
HLP Part Two Policy DMEI 8: Waterside Development⁴⁹	To ensure the relevant provisions of the Thames River Basin Management Plan and any other relevant Catchment management Plans are considered with regards to the Proposed Development.
HLP Part Two Policy DMEI 9: Management of Flood Risk⁴⁹	To ensure that development within Flood Zones 2 and 3a had no other suitable sites of lower flood risk and provides a requirement to submit a Flood Risk Assessment to demonstrate the resilience of the Proposed Development.

4.8.12 HLP Part One: Strategic Policies⁴⁸ and Part Two: Development Management Policies⁴⁹ (**Table 4.3**) provides the current position and the future growth within the key Heathrow Opportunity sub-areas which “*will be focused on sustainable locations such as town centres and areas with good access to public transport*”.⁴⁸

4.8.13 The Airport and Perimeter sub-area identified in **Table 4.3** of the HLP Part One⁴⁸ sets out that:

“Heathrow is a crucial influence in attracting new investment to the area and this [HLP Part One] Policies will ensure that land within the airport boundary continues to be protected for activity directly related to the airport.”

“The Council are broadly supportive of the aspirations to deliver a programme of renewal at Heathrow, subject to no further expansion of the airport. Detailed projects are set out in Appendix 2 (Infrastructure Schedule). The Council will continue its collaborative working with the Airport regarding future uses within its boundaries.”

4.8.14 Appendix 2 of the HLP Part One⁴⁸ identifies the list of schemes that are considered within the LBH’s Infrastructure Schedule. The infrastructure schedule includes the ‘Enabling works for implementation of full runway alternation (ending Cranford agreement)’ as a project to be delivered by British Airports Authority Limited (BAA). The infrastructure schedule sets out as justification the need of the scheme to provide ‘operational reliability’ and, as requirements, the provision of additional taxiways and associated mitigation.

4.9 Heathrow Airport’s Planning History

4.9.1 The Airport began in 1929 as a small airfield (Great West Aerodrome) on land southeast of Heathrow. Development of the whole Heathrow area as a much larger Airport began during World War II and was continued by the UK Government as a civil Airport. The Airport was opened on 25 March 1946 as London Airport and was later renamed London Heathrow Airport⁵².

4.9.2 A summary of most significant planning applications at the Airport prior to 2013 is provided in **Appendix 4.1: Heathrow Airport Planning History, Volume III** of the Environmental Statement. A number of works and developments have been undertaken under General Permitted Development Rights⁵³ over the last decade. These have not been included in this Section due to their limited nature.

4.9.3 There has only been one significant Town and County Planning Act 1990² planning application made over the last 11 years by the Applicant to the LBH. This was Application 41573/APP/2013/1288⁵⁴, for enabling works to allow implementation of full runway alternation during easterly operations at the Airport including the creation of a new ‘hold area’ at the western end of the northern runway, the construction of new access and exit taxiways, and the construction of a noise barrier to the south of Longford Village.

4.9.4 Application 41573/APP/2013/1288 was allowed after appeal on 02 February 2017. A recent review of the requirements for the infrastructure to enable runway alternation on easterly

⁵² Heathrow Airport Limited, (n.d.). *Our History*. [online] Available at: <https://www.heathrow.com/company/about-heathrow/our-history> [Accessed: 02 October 2024].

⁵³ HM Government, (2015). The Town and Country Planning (General Permitted Development) (England) Order 2015. [online] Available at: <https://www.legislation.gov.uk/ukxi/2015/596/contents> [Accessed: 02 October 2024].

⁵⁴ London Borough of Hillingdon (n.d.) *Planning Application Details*. [online] Available at: <https://planning.hillingdon.gov.uk/OcellaWeb/planningDetails?reference=41573/APP/2013/1288&back=no> [Accessed: 02 October 2024].

operations has determined that the location and layout of the physical infrastructure set out in the previous planning application is no longer optimal and other alternatives needed to be considered. This Planning Application and accompanying Environmental Statement are the outcome of that review.