

RESPONSE TO AIRPORT EXPANSION CONSULTATION

27 MARCH 2018

Submitted online by Helen Monger, Director

1. Expanding Heathrow

The expansion of Heathrow will be one of the largest infrastructure projects in the UK and developing our final plan will be a complex process.

We now need your feedback which, together with our on-going design work and the findings of more detailed surveys and assessments, will be used to develop a preferred scheme for Heathrow's expansion.

1a. Please tell us what you think about Heathrow's plans to expand the airport.

I write on behalf of the Planning & Conservation Working Group of the London Parks & Gardens Trust (LPGT). The LPGT is affiliated to the Gardens Trust (GT), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (English Heritage) Register of Parks and Gardens of Special Historic Interest. Inclusion of a site in the HE Register is a material consideration in determining a planning application.

The LPGT is the gardens trust for Greater London and makes observations on behalf of the GT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the London Inventory (see www.londongardensonline.org.uk) and/or when included in the Greater London Historic Assets Register (HAR).

We welcome the opportunity to take part in this consultation. The Trust is concerned about the likely environmental impacts (in particular noise and air pollution) as a result of increased flights and questions the need for additional air traffic in particular for freight. The Trust has commented separately on the air space principles and the likely impact on historic parks and gardens across London.

2. Runway, Terminals and Aprons

Runway

The new runway will be located to the north west of our two existing runways. Runway options in this area have been identified that vary in length from 3,200m to 3,500m and their east-west position. Before answering this question please read

Section 2.1 of the Airport Expansion Consultation Document.

2a. Please tell us what you think about the options for the new runway.

Our main concern relates to the green space and historic landscape within the London Boroughs of Hillingdon or Hounslow. We note that Harmondsworth is likely to be significantly affected, impacting on conservation areas, similarly but to a lesser extent Colnbrook and Sipson. A smaller runway will allow greater land for water runoff (as noted in the consultation documents about preparing for weather extremes).

2b. What factors do you think should be important in fixing the precise location and length of the runway?

We can see that a range of option 'Families' have been considered. Any options which can minimise impacts on the locally important Green Belt and nature designations should be a priority.

Terminals and Aprons

To serve the increased number of passengers and aircraft that will use the expanded airport, new terminal and apron infrastructure will be required. Before answering this question please read Section 2.2 of the Airport Expansion Consultation Document.

2c. What factors do you think should be important in locating new terminal and apron space?

We question the ruling out of expansion of T3 and the need for such a large proposed northern area, which will have the greatest impact on historic landscapes in the vicinity.

Taxiways

A well-designed taxiway system must provide efficient and safe links that deliver predictable journey times for passengers, lower operating costs for airlines, and greater efficiencies which will help us deliver on our commitments around noise and air quality.

Before answering this question please read Section 2.3 of the Airport Expansion Consultation Document.

2d. What factors do you think should be important in deciding the location of new taxiways?

On the basis that expansion is necessary in the proposed location, the Trust accepts that (Around the End Taxiways) ATETs are best placed nearest the M25 to minimise noise disruption to local communities and the surround historic landscapes.

3. Roads and rivers

M25 Alignment and Junctions

The construction of a new north west runway will extend the airport to the west. This will affect the route of the M25 between Junctions 14 and 15 and the operation of Junctions 14 and 14a. Before answering this question please read Sections 2.4 and 2.5 of the Airport Expansion Consultation Document.

3a. Please tell us what you think about the re-positioning of the M25.

The Trust has no expertise in this area but recognises the ingeniousness of the engineering proposal which enables the M25 to continue whilst building a tunnel. The Trust objects to proposals for 'collector-distributor' roads which will further increase the use of land and is likely to encourage greater road usage.

3b. Please tell us which family of options you prefer for the alterations to Junctions 14 and 14a and the reasons why.

The Trust does not have expertise in this area but reiterates it's response to 3a.

Local Roads

The expansion of Heathrow will affect local roads. There are a number of options for replacing these roads, transferring traffic on to other routes and re-establishing local connections. Before answering these questions please read Section 2.6 of the Airport Expansion Consultation Document.

3c. Please tell us which option you prefer for the diversion of the A4 and the reasons why.

The Trust does not have expertise in this area.

3d. Please tell us which option you prefer for the diversion of the A3044 and the reasons why.

The Trust does not have expertise in this area.

3e. Please tell us which option you prefer for the Stanwell Moor junction and the reasons why.

The Trust does not have expertise in this area.

3f. Please tell us what you think about the options to improve access to the Central Terminal Area.

The Trust does not have expertise in this area.

River Diversions and Flood Storage

The expansion of Heathrow will affect local rivers and areas of flood plain. There are a number of options for the diversion of these rivers and the replacement of flood storage. Before answering these questions please read Section 2.7 of the Airport Expansion Consultation Document.

3g. Please tell us what you think about the options for the diversion of rivers and the approaches to replacement flood storage.

The Trust welcomes the approach in section 4.6 seeking to prioritise: Biodiversity; Water Environment; and Landscape and Visual Amenity. The Trust would like to see the airport consider social amenity of landscapes too – enabling some public access where possible to some of the natural habitats that will be created or maintained. As an overarching principle, the Trust would recommend that the airport seeks to maintain as much as possible of what is already present rather than re-creating/creating new habitats.

Until further details are explored about the proposals for flood storage it is difficult to comment but we would prefer an option that seeks to minimize extending the land buried under water and Approach 1 although more costly to deliver offers a way of achieving this to the benefit of the natural environment. The Trust suggests that the use of Natural Capital Accounting be used as a way of offsetting the cost of investing in particular options versus the long term benefits to have a fuller picture of the cost-benefit analysis.

4. Additional land

To support the operation of an expanded airport we will need additional land outside the airport boundary. This will include land for construction sites, car parking and commercial facilities, as well as new landscaping. We will also need land to accommodate businesses that need to be relocated. Before answering these questions please read Sections 2.8 to 2.11 of the Airport Expansion Consultation Document.

4a. Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport supporting facilities.

The Trust does not have expertise in this area.

4b. Please tell us what you think about our approach to providing car parking and the potential site options we have identified.

The Trust does not have expertise in this area but would prefer to see as much parking kept within the boundaries of the airport and greater consideration of public transport as the primary method for approaching the airport.

4c. Do you have any comments on the land uses that will be affected by Heathrow's expansion?

The Trust does not have expertise in this area. The Trust is interested in the areas intent for landscaping and planting to reduce the potential effects of expansion which have yet to be specified. The Trust would urge horticultural variety for visual amenity and to mitigate against air pollutants and water runoff.

4d. Please tell us what you think about the sites identified for the relocation of the Immigration Removal Centres? If you have a preference, please tell us why.

The Trust does not have expertise in this area.

4e. Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport related development.

The Trust does not have expertise in this area.

4f. Do you have any views on how the demand for additional airport related development such as hotels and offices might best be delivered?

The Trust does not have expertise in this area.

4g. Please tell us how you think we should best bring the various components together to build our masterplan for the expansion of the airport and what factors you think should be most important in our decision-making.

The Trust questions the overall scale of the expansion and would prefer to see as much development confined within the envelope of the airport site. The Trust urges further consideration of the visual intrusion from nearby historic landscapes such as Cranford Country Park; Victoria Lane Burial Ground; St Mary's Churchyard, Harmondsworth Burial Ground and Harmondsworth Village Green which are designated historic landscapes.

4h. Please tell us what you think about the sites we have identified as potential construction sites, and the approaches we are considering to manage the effects of construction.

The Trust does not have expertise in this area.

5. Managing the effects of expansion

The expansion of Heathrow must happen in the right way. We have developed a number of approaches to ensure that the effects associated with the construction and operation of an expanded Heathrow are effectively managed. You can find relevant information on these approaches in Section 4 of the Airport Expansion Consultation Document.

Property Compensation, Property Hardship and Land Acquisition

We recognise that people who live in or own property near Heathrow will be affected by its expansion. Section 4.1 of the Airport Expansion Consultation Document and our Property Policies Information Paper sets out our proposals to ensure that those affected are fairly compensated.

5a. Please tell us what you think about our Property Policies.

The Trust does not have expertise in this area.

Noise

Noise is one of the most significant concerns for communities living close to airports. Section 4.2 of the Airport Expansion Consultation Document and Our Approach to Noise set out options to reduce, minimise or mitigate the effects of noise arising from the expansion of Heathrow.

We would like to know your views on Our Approach to Noise, in particular:

5b. A noise envelope is a package of measures that can be used to reduce noise. Please tell us your views on the objectives of the noise envelope and the timeline for its development.

The Trust notes that Heathrow's committed goal is to expand while affecting fewer people with noise and the achievements reducing existing noise levels. We feel that the goal should be extended to affecting people with less noise overall (not just fewer people) - this is pertinent to wildlife benefits too. The Trust acknowledges proposals for working with a Community Noise Forum but questions what powers they will have in the decision making process if they are to be effective. The Trust welcomes use of quieter planes, noise insulation and ban on night flight. The Trust has commented separately on the Airspace Principles Consultation - but urges a re-think on flying over parkland particularly designated historic spaces. The Trust believes that as well as compensating householders, the airport should compensate local authorities for

loss of amenity value in park land by setting up a fund for public parks as part of any compensatory measures and that this has been overlooked.

5c. Is there anything further we should be considering to reduce noise?

No further comments.

5d. Please tell us what you think about our suggested approach to the provision of respite.

The Trust welcomes any respite afforded, particularly for the benefit of natural areas of land.

5e. Please tell us what you think of our proposals for noise insulation and phasing of delivery.

See comments in 5b – the Trust believes the amenity value of public parks and open land has been overlooked and that a fund should be set up in perpetuity for surrounding London Boroughs to enable them to invest in other public parks in their areas to compensate for the loss of amenity value for their residents.

5f. A 6.5 hour night flight ban on scheduled flights is required sometime between 11pm and 7am. Our current preferred option for this is from 11pm to 5.30am. Please tell us when you think the night-flight ban should be scheduled and why.

The Trust has no expertise in this area but would recommend further thought is also given to natural considerations such as impact on birdsong. Additionally the Trust would want to see public transport fully integrated into the preferred options so that if people needed to check in for early flights they can easily get there.

Surface Access

Section 4.3 of the Airport Expansion Consultation Document and Our Approach to the Development of a Surface Access Strategy set out our priorities and targets for the ways in which passengers, visitors, workers and commercial traffic will access the expanded airport.

We would like to know your views on Our Approach to the Development of a Surface Access Strategy, in particular:

5g. Please tell us what you think about our priorities and initiatives we propose to use to develop our surface access strategy.

The Trust does not have expertise in this area but welcomes all transport that minimises environmental impacts.

5h. Please tell us what you think about the options to use road-user charging to reduce emissions and to manage vehicular access to the airport.

The Trust does not have expertise in this area.

Air Quality and Emissions

Section 4.4 of the Airport Expansion Consultation Document and Our

Approach to Air Quality set out options and approaches to reduce or mitigate the potential local air quality effects that may arise due to the expansion of Heathrow.

We would like to know your views on Our Approach to Air Quality, in particular:

5i. Please tell us what you think about the measures proposed to manage emissions. Are there any other measures that we should consider?

The Trust welcomes the 'triple lock' but also urges greater consideration is given to horticulture as a means of carbon sequestration and other air pollutant capture.

Carbon and Climate Change

Section 4.5 of the Airport Expansion Consultation Document and our Approach to Carbon and Climate Change set out potential options and approaches that could be used to reduce or mitigate the carbon and climate change effects anticipated to arise as a result of the expansion of Heathrow.

We would like to know your views on Our Approach to Carbon and Climate Change, in particular:

5j. Do you have any comments on our approach to limiting carbon emissions from the design, construction and operation of an expanded Heathrow?

There are insufficient details to comment on at present but the Trust urges as much use of green infrastructure (living walls, grass amenity areas, interesting planting) as possible to seek carbon reduction and also enable water absorption to avoid flooding.

Natural Environment

Section 4.6 of the Airport Expansion Consultation Document and Our Approach to the Natural Environment set out the key design considerations and provide our likely response to the natural environment as part of the expansion of Heathrow.

We would like to know your views on Our Approach to the Natural Environment, in particular:

5k. Please tell us what you think about our approach to natural environment issues.

The Trust warmly welcomes these measures. The Trust is aware of a number of environmental initiatives taking place at the airport including beekeeping. The Trust would welcome more opportunities for the public to visit the proposed landscaped areas taking into account needs for security and safety. Participation in events such as Open Garden Squares Weekend with guided pre-booked tours would go some way to allowing the public a greater understanding of the natural landscape around the airport.

5l. Are there any opportunities that the expansion of Heathrow could provide to enhance the natural environment?

From the documentation provided it looks as if almost all avenues have been explored on site. However, the Trust believes insufficient account has been taken of the loss of amenity value for many of the surrounding parkland and nature rich areas as a result of the increased air traffic. As previously mentioned, the Trust believes that an endowment fund; grant scheme; or additional flight levy should be set up for London's public Parks to support their maintenance and enhancement in the surrounding boroughs most impacted by the airport development, so that public amenity can be supported/or provided elsewhere.

Historic Environment

Section 4.7 of the Airport Expansion Consultation Document and Our Approach to Historic Environment set out the key considerations and provide our likely response to the historic environment as part of the expansion of Heathrow.

5m. Please tell us what you think about our approach to historic environment issues.

The loss of heritage assets such as the Longford Conservation Area are irreplaceable and whilst way finding and cycle paths are helpful for the remainder there is an undeniable cost. Whilst capital investment is welcome, a better option would be to set up an ongoing levy or other mechanism to fund and sustain other heritage assets (and in particular parks and historic gardens across London which are not supported through any statutory funding). This would bring a huge benefit across the capital and provide a unique way of supporting and offsetting the damage being caused in perpetuity.

Other considerations

6. Having considered everything you have read, do you have any further comments in relation to our proposals for the expansion of Heathrow?

No further comment.

7. Please tell us your views on this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and feedback form etc.).

The Trust acknowledges that this is a very complex development proposal that inevitably has led to substantial documentation. Nonetheless it was frustrating to have to cross-refer with the Emerging Plans and other documents that did not always follow the same sequence - it would have been better to have single subject booklets eg. conservation; noise; pollution; airport logistics etc. Many of the questions were technical and the opportunity to skip sections would have been helpful. The maps were inadequate with changing scales dependent on the subject. The heritage and environment discussion would have benefitted from a mapping of the the conservation areas and historic building being lost and those in the noise envelope to better understand the issues.

The exhibition in areas some distance away but nonetheless impacted, such as the display in Vauxhall is welcomed.

- ENDS -