

Dear Mr. Holland-Kaye

Buckinghamshire County Council (BCC) and the Buckinghamshire LEP (BLEP) welcome the opportunity to respond to Heathrow Airport Limited's (HAL) statutory Airport Expansion Consultation. As Buckinghamshire is a 'host authority' for the Development Consent Order (DCO) and a statutory consultee on the Airspace Change Process, our response sets out our position on the development of the Heathrow Expansion Scheme. As we move towards a single Council being established for the whole of the County in April next year, we continue to work closely with the four District Councils in considering airport expansion proposals.

I would wish to thank the Colne Valley Park Community Interest Company (CVP), who we are working closely with to develop the Green Gateway Legacy in Buckinghamshire. These proposals now cover and indeed have joint support from Slough, Windsor & Maidenhead and South Bucks councils having been collectively developed with the CVP and endorsed by the Heathrow Strategic Planning Group (HSPG). You will know from the bilateral meetings that I and Martin Tett; the Council Leader have with the HAL team that we want to ensure that Heathrow expansion fairly and reasonably mitigates its impacts, providing long term net gains for our residents to offset impacts and indeed for the wider community in surrounding areas. The Joint Connectivity Map produced with partners to promote Heathrow's Green Gateway Legacy provides for new footpaths and ecology and links to existing housing and business areas which can mitigate the impacts of Heathrow's expansion. We remain committed to assisting you in delivering this required mitigation subject to agreeing suitable commercial terms in the interests of Council Taxpayers.

- **Key Issues**

This letter sets out our key points along with a summary of key demands arising from the section 42 consultation. The appendices attached to the letter provide a full response to each topic covered by the consultation. In summary, at this stage and given the consultation material, BCC has the following key issues:

1. Lack of agreement with BCC at this stage over a fair and reasonable mitigation package to be provided to ensure compliance with the NPS;

2. Local impacts and mitigation, including transport concerns at specific locations (e.g. the Ivers villages) and across the wider Buckinghamshire area, and the need for a comprehensive package of public transport, in part to address local air quality and accessibility concerns;
3. Progression of work to ensure the job and business benefits of expansion are available to Buckinghamshire's residents and companies
4. Environmental mitigation in relation to flooding, green infrastructure and biodiversity to ensure the proposal accords with the Airports NPS;
5. Flight path changes and related noise impacts, including impacts on our Country Parks and noise sensitive locations such as Pinewood Studios
6. Concern over lack of detail in consultation material.

- **General Comments on Consultation Material**

The fact that we as local Councils needed to develop the Green Gateway Legacy proposals does though unfortunately reflect the embryonic status of HAL's plans presented in the consultation. Whilst we welcome the progression of HAL's economic development plans and the inclusion of all of the Buckinghamshire in the areas where Heathrow will assist in developing skills and job opportunities, it is disappointing that across many other topics HAL's plans are incomplete. Consequently you will see that many of the comments from my technical teams are along the lines that at this statutory consultation stage we would have expected not just an explanation of how HAL will assess the impacts of expansion, but also a first cut of what all those impacts will be and critically how they will be mitigated.

The Council's members voted in April 2017 to support Heathrow expansion subject to the appropriate mitigation being secured. Some two and half years later though, through bilateral discussions and the consultation material, we are yet to be satisfied with the provisions HAL have included. Heathrow's expansion will have a significant impact on the county and we consider that a project of this size should be an exemplar in delivering a legacy of high quality mitigation. This must, for example, include addressing the construction stage transport impacts, particularly in the Ivers. Given our concern that Heathrow's plans currently fail to provide the required mitigation in Buckinghamshire we will keep under review whether support for expansion is merited. Should the required mitigation, not be evident from further iterations of HAL's plans in the next six months our position of support would be reconsidered. I would hope though that well before HAL's application is submitted next year, we can agree a satisfactory package of mitigation which addresses the environmental and transport impacts as well as setting out how Buckinghamshire's residents and business can access jobs and other opportunities which expansion can support.

We are disappointed that given the amount material published, that there is a significant lack of detail which technical officers require to assess the potential impacts. Whilst we welcome that three consultation events were held in Buckinghamshire, it is evident that the lack of conclusions on impacts and detail of proposals mean the consultation has not been at a stage



or presented sufficient information to enable residents to engage with or meaningfully comment on HAL's plans.

- **Aircraft Noise**

As the Planning, Public Health and business bodies, we understand that aircraft noise, and in particular new flightpaths over previously unaffected areas cause not only disturbance but can impact upon the well-being of residents and affect health and productivity through disturbed sleep, for example. Aircraft noise can also impact on our residents and visitors, including children and staff at schools and the many people using our local open spaces and Country Parks. We also note that an increase in flights, whether it is the proposed initial uplift of 25,000 air traffic movements on the two runway configuration, or the step change increase in capacity associated with a three runway airport, would also increase passenger and staff surface access pressures, this will have a significant impact on air quality including in the Ivers Air Quality Management Area (AQMA).

- **Transport and Connectivity**

We consider that Heathrow should only be permitted to expand, including a phased increase in flight numbers when the following conditions are met:

- The airport and Government invest in sufficient surface access improvement including rail, road and coach links, for example, to deliver the “no net increase in traffic” commitment (para 3.51) and modal shift commitment (para 5.17) in the Airports NPS
- That investment demonstrably delivers capacity which makes it easier for people and goods to access and leave the airport using sustainable links, not increasing congestion on our local roads and motorways
- The modal shift to sustainable and active modes improves air quality is evident

We refer to this as our ‘triple lock’ to support expansion.

I would also wish to reiterate past discussions with the HAL team that Buckinghamshire sits in a unique strategic location as the Authority linking the airport to England's Economic Heartland and the Oxford to Cambridge Arc. It is essential that north/south connectivity to the airport is improved as part of expansion considerations. We would particularly welcome HAL's public commitment to support the High Wycombe to Old Oak Common rail link as part of your wider Surface Access plans submitted with the DCO to ensure that links in and through Buckinghamshire play their part in linking the country's global hub with international business and world renowned academic and research centres across the Arc.

- **Socio Economic, Employment and Skills**

The Airports NPS (para 1.29) acknowledges that inevitable harm caused by a new Northwest Runway at Heathrow in relation to some impacts, but the need for the scheme, the obligation to mitigate such harm as far as possible, and the benefits that such a scheme will deliver, could outweigh such harm.



Paragraph 5.266 says the Government expects the applicant to maximise the employment and skills opportunities for local residents, including apprenticeships.

Therefore, before the final design fix for the proposed DCO application, we are concerned to agree with HAL for its area, residents and businesses the mitigation package that mitigates the harm as far as possible and the significant benefits required to outweigh the harm to ensure compliance with the NPS. We are not currently satisfied that this has been demonstrated or achieved.

BCC and BLEP welcome the broad direction of travel of the of the Economic Framework (EF) for the Heathrow Expansion project, this has identified the appropriate areas of focus and collaboration which are paramount for Buckinghamshire partners to plan for and secure any emerging economic and skills benefits. It should be noted that we would ideally have expected the EF to have progressed to a Full Draft Economic Development Strategy at this stage of the DCO consultation. We hope that the work being undertaken as part of the HSPG Business and Economy Sub-Group and the task and finish groups in the areas of skills brokerage, SME Engagement and Business and Innovation together with the joint Economic Vision and Action plan will help develop this strategy and highlight opportunities for transformative productivity growth both within Buckinghamshire and across the region.

Buckinghamshire is the fourth most productive area in England and is home to world renowned skilled sectors, including Pinewood in South Bucks. The recently published Local Industrial Strategy identifies the crucial importance of access to an expanded Heathrow Airport as a global gateway for the economic vitality of our country.

We are encouraged by the commitment to include South Bucks as a core area and Buckinghamshire as a 'wider sub-regional context area' within your Business and Economy Strategic Framework. This should ensure that opportunities of being part of Britain's global gateway, having business contract opportunities, showcasing innovation, acknowledgment of the skills potential through our schools and colleges, and construction and operational business openings are maximised. We welcome the discussions between HAL, LEP skills advisory panel, Bucks New University and the Buckinghamshire College Group as securing a long lasting sustainable skills legacy is of great importance to BCC and BLEP in order to maximise the opportunities presented by Heathrow expansion and the high quality of education in Buckinghamshire.

These opportunities rely heavily on improved connectivity to the airport for businesses and communities across the County. BCC and BLEP welcome the identified new coach and bus provisions within the consultation. We want to work alongside HAL to develop a more comprehensive package of demand responsive and low carbon transport options, including access to the Old Oak Common hub and a development of a suitably mitigated Western Rail Access scheme. Collectively these can provide greater choice for residents and businesses and to enhance the capacity and resilience of the Heathrow hinterland's transport options in order to mitigate the impacts of the scheme and achieve its objectives. .

- **Transport and Highways**



The Airports NPS (para 3.75) recognises that a number of mitigation measures will need to be used to reduce the negative impacts of the Heathrow Northwest Runway scheme on the local community and the environment. Airport expansion is also expected to be accompanied by an extensive and appropriate compensation package for affected parties. It is only with these safeguards in place, did the Government consider that the Heathrow Northwest Runway scheme deliver the greatest strategic and economic benefits, and was therefore the most effective and appropriate way of meeting the needs case in the NPS.

Paragraph 5.5 sets out that the Government's objective for surface access is to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport is maximised as much as possible. This should be delivered in a way that minimises congestion and environmental impacts, for example on air quality.

Paragraph 5.6 notes that without effective mitigation, expansion is likely to increase congestion on existing routes and have environmental impacts such as increased noise and emissions. Paragraph 5.21 acknowledges that HAL's proposals will give rise to impacts on the existing and surrounding transport infrastructure and the Secretary of State will consider whether HAL has taken all reasonable mitigation steps during construction and the operational phase.

Therefore, before the final design fix for the proposed DCO application, BCC is concerned to agree with HAL all reasonable mitigation measures within, linking and benefitting Buckinghamshire's residents and businesses needed to support the underlying justification and requirements of the NPS to ensure policy compliance. BCC is not currently satisfied with the assessment and consequent lack of a coherent mitigation package.

The area around the Ivers in southern Buckinghamshire is to be affected by a number of Nationally Significant Infrastructure Projects (NSIPs), not least the Heathrow Expansion, but also including Western Rail Link to Heathrow, the M4 Smart Motorway project, HS2 and Crossrail. This area is already subject to increasing pressures by HGV's, including from Heathrow's current operations, particularly in Iver village, which is the centre of the Ivers AQMA. We are working with all of the scheme promoters in this area to manage the associated freight movement impacts on traffic capacity and subsequent health and environmental impacts.

Our primary concern, on this matter, is to secure a commitment to fair and reasonable contribution to mitigation. The information within the consultation provides insufficient evidence on the potential traffic change on the local highway network of Buckinghamshire: this is the case in both the construction and operational phases of expansion. This necessarily affects the development of any case for mitigation measures. We request that the traffic information is submitted to our Highways Development Management team urgently in order for the Highways Authority to be reassured through agreement with HAL that any impacts can and will be mitigated ahead of the DCO submission.

One of the potential schemes we have been promoting as potential mitigation addressing the cumulative impacts in the area immediately adjacent to the airport is the Iver Relief Road

(IRR). The proposed IRR is included in the emerging Chiltern and South Bucks Local Plan (Submission version June 2019) and so due consideration should be taken by any developments affecting this area. Having proposed the IRR in each of previous consultation responses and secured the agreement of HSPG Leaders to support the IRR in its past consultation responses it is disappointing that the IRR has not featured in HAL's consultation material as a proposal to which HAL make a fair and reasonable as potential mitigation option. If the IRR had been identified as an option then wider stakeholders would have been able to comment. You will know from consultation events and meetings with the local community and councilors that their main aspiration to address the cumulative impacts of the multiple projects in the area is a fair contribution from each project to deliver the IRR.

Furthermore we are disappointed that construction traffic and traffic displacement as a result of construction activity has not been properly considered in the highway assessment model. We also understand, but do not agree, that that the 'no more traffic pledge' does not include construction activities. This raises concerns about displaced traffic and disruption emerging from construction activities, not least from the proposed Flood Storage Areas (FSA) within Buckinghamshire.

We also have concerns about the provision of alternative transport methods in Buckinghamshire to Heathrow. As a result of these we are concerned about Heathrow's ability to meet the Airports National Policy Statements targets of 'mode share' and 'no more traffic'. Because of this we request a number of modelling sensitivity tests to be carried out in order to determine the impacts of some of the key transport and demand assumptions that have been made by HAL. These include the impacts of different construction scenarios. We are disappointed that no attention has been given to this sensitive area within the consultation material. This is a huge cause of concern for the communities in the immediate area as they are unable to engage in any options or schemes which may mitigate the impacts or compensate the local community. This is a priority concern and we request urgent discussions to progress the understanding of what cumulative impacts can be expected from the Heathrow expansion and how these are proposed to be mitigated. We also wish to continue to work with HAL on securing the proposed local bus and coach services provision ahead of the scheduled opening year.

- **Green Gateway Legacy**

The Airports NPS (para 5.106) acknowledges that access to high quality open spaces and the countryside and opportunities for sport and recreation can be a means of providing necessary mitigation and / or compensation requirements. Green infrastructure can enable developments to provide positive environmental and economic benefits.

Paragraph 5.119 says that where green infrastructure is affected, the applicant should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to National Trails and other public rights of way.



Paragraph 5.120 says the Secretary of State in determining a DCO application must also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for. Paragraph 5.127 acknowledges that, when located in the green belt, projects may comprise inappropriate development requiring very special circumstances to justify consent being granted.

The guiding principle for mitigation and compensation from Heathrow expansion should be a long lasting legacy of projects with multifunctional benefits for the impacted communities to offset impacts. BCC and a number of local bodies have been progressing discussions to create a 'Green Gateway Legacy' across southern Buckinghamshire and the Colne Valley Park. This is a priority for BCC and could result in a multitude of social, environmental, and economic benefits to the area as a countermeasure for the negative impacts of the expanded airport's construction and operation.

Land options under discussion in southern Buckinghamshire and the Colne Valley Park, including land promoted to HAL by BCC provide a unique opportunity for HAL to truly leave a lasting legacy. Given that the Airports National Policy Statement (ANPS) places importance on the mitigation and/or re-provision of the green infrastructure network and open spaces impacted by the proposal, the Green Gateway Legacy presents an ideal opportunity to enhance the value and multifunctional use of the Buckinghamshire Green Belt, including at the identified FSA's.

As set out above we are disappointed with HAL's proposals in the consultation, not least as they fail to even show new footpaths links presented to HAL in our previous consultation responses even as options as part of the 'legacy' proposal. HAL's active travel proposals, while promising, are not extended into Buckinghamshire: the focus has, disappointingly, been on routes which solely function as 'commuter corridors' and we consider that this will not meet the policy tests in Airports NPS. Currently, access to Heathrow from Buckinghamshire is poor. By public transport, the journey is often lengthy and requires a number of connections, while active travel is particularly unsafe and indirect. For example, the Ivers close proximity to the airport (less than a mile from the expanded airport campus boundary) means it is home to many airport related workers who have no choice but to rely on unsustainable modes of transport.

We are concerned that where these sustainable transport deficiencies remain unaddressed, and significantly worsen due to expansion, residents and business in Buckinghamshire may miss out on potential benefits. If no sustainable access alternatives are developed (including safe crossing of the M4), the majority in Buckinghamshire will continue to rely primarily on the private vehicle. Given the proposed access charges this will leave our residents and businesses particularly disadvantaged. This area is also the most constrained part of the Colne Valley Regional Park and with expansion impacting upon this area it is essential to improve sustainable travel north-south links to ensure its functionality.

We support HAL's commitment to providing a Net Gain from the expansion project, however, the consultation lacks in sufficient detail regarding biodiversity. As a result of limited survey coverage, the baseline data and assessment of potential impacts and so proposed mitigation measures are unsound and do not demonstrate biodiversity Net Gain (para 5.86, Airports



ANPS). Our expectation is that HAL will engage with the Council and local stakeholders on how you plan to achieve Net Gain once sufficient baseline data collection and assessment have been completed. On the sites currently identified as biodiversity mitigation locations, we have concerns that these are not included within the red line boundary for the application which may impact the quality, management and maintenance of these sites in the long-term.

- **New noise Impacts**

The Airports NPS (para 5.44) acknowledges that the impact of noise from airport expansion is a key concern for communities affected, and the Government takes this issue very seriously. High exposure to noise is an annoyance, can disturb sleep, and can also affect people's health. Aircraft operations are by far the largest source of noise emissions from an airport, although noise will also be generated from ground operations and surface transport, and during the construction phase of a scheme. At paragraph 5.47, the Government says it wants to strike a fair balance between the negative impacts of noise (on health, amenity, quality of life and productivity) and the positive impacts of flights.

We continue to share the concerns that residents in Buckinghamshire have regarding changes to flightpaths, particularly where the public is unable to meaningfully engage until flightpath route options (Phase 2a and Phase 3) are consulted on. At consultation events held in Gerrards Cross, Beaconsfield and Richings Park, residents felt unable to sufficiently understand how the increased capacity would affect them. We understand that the Airspace Change Process (ACP) is technical and is separate to the DCO, but where the consultation materials did not set out the current situation alongside the new proposals in a single place, residents and businesses were unable to understand potential impacts which causes uncertainty and anxiety.

We are also concerned about the impact new aircraft noise will have on the tranquility and rural experience of visitors and users of Black Park, Langley Park, Thorney Park and the Chilterns AONB. The Country Parks are commonly used by Pinewood Studios for filming and so an increase in noise is likely to jeopardise the use of the parks and increase the costs for Pinewood and other Studios. The Airports NPS (para 5.213) recognises that, for airport development, landscape and visual effects also include tranquility effects, which would affect people's enjoyment of the natural environment and recreational facilities. Paragraph 5.218 says that the scheme needs to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the development should aim to avoid or minimise harm to the landscape – and people's use of it - providing reasonable mitigation where possible and appropriate.

We also continue to reiterate our principle policy position of minimising the number of new communities overflowed from the changes in airspace as part of ensuring that flightpath designs have the least overall impact on residents, business and the environment. Having provided noise sensitive locations at the Airspace and Future Operations Consultation earlier this year, we request that a map is provided to illustrate what sites HAL are considering in their current noise analysis. Changes to flight paths and the resulting likely significant environmental effects will also need to be fully addressed in the environmental statement on a robust worst case scenario.

- **Summary of Key Mitigation and Requested Information**

It is essential that BCC and BLEP are to be able to work and agree a mitigation package with HAL as soon as possible for inclusion in a draft Statement of Common Ground before the design fix for the proposed DCO application on the following matters:

1. HAL commitment to provide a financial contribution to the Ivers Relief Road;
2. BCC welcomes the identified new coach and bus provisions, but wants to work alongside HAL to develop and agree a more comprehensive package of transport options including access to the Old Oak Common Hub and the Western Rail Access Scheme which would support access to jobs at Heathrow and skills and business opportunities in the county;
3. HAL commitment to the Green Gateway Legacy providing for new footpaths and ecology and links to existing housing and business areas, with active travel proposals extended into Buckinghamshire;
4. HAL commitment that new flightpaths and aircraft noise will have no or minimal impact on the tranquility and rural experience of visitors and users of Black Park, Langley Park, Thorney Park and the Chilterns AONB. HAL commitment and demonstrable design steps to avoid impacts on noise sensitive properties in Buckinghamshire including Pinewood Studios; and

It is also vital to BCC that we receive the following information from HAL as soon as possible to enable BCC to carry out a proper assessment and provide comments to HAL before the design fix for the proposed DCO application:

- 1) Full detail Economic Development Strategy and the opportunity for BLEP and BCC to comment on the same;
- 2) Traffic information for construction and operational phases to enable BCC as Highway Authority to assess the impacts of the scheme and confirm it is satisfied that appropriate mitigation is proposed;
- 3) Re-modelling and reassurance that construction traffic and traffic displaced as a result of construction has been properly considered, along with justification as to why the “no more traffic pledge” should not include construction traffic in accordance with the Airports NPS;
- 4) Modelling sensitivity tests to be undertaken which should include an assessment of impacts of different construction scenarios and cumulative impact considerations;
- 5) Greater survey coverage on biodiversity and baseline data collection, provision of that data and further engagement with BCC to identify opportunities for and then demonstrate biodiversity “Net Gain”;

- 6) Confirmation and identification of the inclusion of biodiversity mitigation locations within the DCO application boundary;
- 7) Material showing changes to flight paths setting out the current situation alongside the new proposals in a single document for inclusion in the DCO application; and
- 8) Please provide a map to illustrate which sites HAL are considering in its current noise analysis and we request that HAL demonstrate to us that the then planned changes to flight paths and resulting noise is robustly assessed on a worst case scenario in the DCO application.

Please confirm a likely timeframe for receipt of each of the requested information.

Our detailed technical response is included within the attached appendices. Without a comprehensive mitigation package for Buckinghamshire we consider that the DCO application would not comply with the Airports ANPS and so may not the Secretary of State in making robust decisions about the Expansion scheme and future Airspace Change proposals. Our detailed technical response is included within the attached appendices. We look forward to continue working with HAL, the DCO Examining Authority and the CAA in order that through addressing our concerns with HAL we can seek to get to the position of confirming continuing support for HAL's proposal.

Yours sincerely,

Cllr Bill Chapple OBE
Cabinet Member for Planning and Environment

Andrew M. Smith
Board Chairman
Buckinghamshire Local Enterprise Partnership

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Buckinghamshire Members of Parliament
Bucks Planning Group
Colne Valley Regional Park
County Councilors
The Rt. Hon. Grant Shapps MP
Caroline Low, DfT

LEP Board Members
England's Economic Heartland
Chilterns AONB
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