Heathrow Expansion

Environment Impact Assessment

Scoping Report 2025

Response from Spelthorne Borough Council
(October 2025)

Contents

Introduction

This document presents Spelthorne Borough Council's (SBC) response to the PINs consultation exercise on the Heathrow Expansion's Environmental Impact Assessment (EIA) Scoping Report, received on 03/09/2025. The key document considered in the preparation of this response is the 'EIA Scoping Report Addendum – Expanding Heathrow (Document Reference: 10000-XX-SY-XXX-100020)' dated 01/09/2025 and its supporting appendices, together with the material previously considered in 2018.

The Executive Summary of the above document states that '*the description of the proposals upon which the 2018 EIA Scoping Opinion is based remains materially the same and no additional pathways for new or different potentially significant effects have been identified beyond this*', and as such this response builds upon the Council's previous comments from the 2018 scoping exercise (Appendix 1), reaffirming their relevance and expanding on new concerns arising from the updated documentation.

General Comments

- On the basis of the documents under consideration it is not clear whether there is still a commitment to the development of western and southern rail schemes as an integrated part of the expansion project. Any rail scheme (even if considered under its own DCO) will impact upon environmental, economic and transport assessments. Given the potential in-combination impacts of Heathrow expansion together with the delivery and operation of western and southern rail access proposals, clarity on rail schemes must be provided at the earliest opportunity, to ensure that combined impacts can be adequately considered.

- There should be consideration of Local Plan policies from individual adopted Local Plans and any new Local Plans that have reached Regulation 19 (and beyond) and can be considered to be 'advanced' and have 'weight'. The Spelthorne Local Plan Examination Hearings finished on 18 February 2025 and Main Modifications consultation closed on 15 May 2025. The Inspector's letter is due imminently and will be considered for adoption by the Council this autumn. It is essential that the applicant consider Local Plan enabled growth, including planned residential growth and new economic growth within the study area, as well as Local Plan policies for environmental protection.

- The current scoping provides an illustrative boundary and scheme, however, SBC reserves the right to challenge components of the expansion masterplan, if the final scheme taken forward is materially different, or if sufficient consideration has not been given through the EIA.

Local Government Reorganisation (LGR)

The Report acknowledges the Government's plans for Local Government Reorganisation (LGR), stating: "*The Environmental Statement (ES) will consider all such policy and documentation adopted or under consultation at the point of drafting, and will account for any structural changes resulting from local government reorganisation*." This acknowledgement is welcome. However, given that Surrey County Council and the Surrey districts and boroughs (particularly Spelthorne, Runnymede,

and Elmbridge as immediate neighbours) are Statutory Consultees in the Heathrow Expansion project, and that LGR in Surrey is progressing rapidly, the overlap in timing between these two significant areas of work is of concern. The capacity of the Local Planning Authorities (LPAs) to manage a strategically key project during the transitional period is uncertain. This is compounded by the lack of clarity around the transitional arrangements for the transfer of statutory functions to the new authorities. As a result, there is a risk of inconsistent engagement and limited participation by affected authorities between the elections to the shadow authority/ies in May 2026 and the establishment of the new authority/ies in early 2027. Furthermore, while the report notes that emerging policy will be considered, the timing of the DCO process alongside LGR does not provide newly formed LPAs with sufficient opportunity to develop an informed position with their newly elected Members and electorate or engage effectively with what is a regionally significant decision.

SBC is a member of the Heathrow Strategic Planning Group (HSPG). In light of LGR and the need for consistent engagement throughout the transition period, together with the capacity issues identified above, meaningful engagement with local authorities via HSPG, as a key mechanism during the DCO process, will be fundamental to achieving a successful outcome. SBC request that the applicant commit to ongoing engagement and collaboration with, and funding for HSPG and their commissioned consultants. In addition to clarity and assurance on HSPG's role, SBC requests that a timetable for the DCO process be made available at the earliest opportunity. This will enable LPAs affected by LGR to plan and prepare for the level of engagement required for a project of this scale and strategic importance, while navigating the complexities of reorganisation.

Commentary on EIA Scoping Report Chapters

Executive Summary

Para	Section Title	Comment
	Executive Summary	*'The exception is a change to the draft Order Limits boundary to include land required to deliver environmental mitigation/enhancement and to provide upgraded transport infrastructure such as junction improvements. For the purposes of this EIA Scoping Addendum, no preferred masterplan has yet been fixed for the purposes of the DCO Application (the 2019 consultation representing a preferred masterplan only), and multiple design options remain under active consideration.'* Many of the environmental disciplines are highly spatial in nature and as the application progresses further, information on a clear masterplan is going to be necessary for effective consultation. The applicant should provide information as to when design options that are under consideration will be presented to consultees for comment.
	Executive Summary	*'The comments in the 2018 EIA Scoping Opinion will be addressed in the ES and specific commentary is only presented in this EIA Scoping Addendum where it is proposed that an approach will be taken in the ES that differs from the position in the 2018 EIA Scoping Opinion. Where this is the case further information and justification for the proposed approach is provided.'* The 2018 scoping report referred to a PEIR. However, the addendum report only refers to an Environmental Statement. The applicant should

		clarify whether there will be a PEIR, and how the scoping addendum would apply to that stage of assessment. As per the comment above the spatial nature of the environmental disciplines means that for consultation to be effective a master plan and design options need to be shared with consultees. The paragraph above from the executive summary seems to indicate for the next step is the ES. Several areas of the scoping report refer to design based mitigation, when will consultation on design take place.
	Executive Summary	*In summary, the following effects are proposed to be 'scoped out' of the EIA:* • *PINS ID 74 and 81: Potentially significant effects in respect of rivers, flood storage and flooding within the health assessment;* There is a climate related health aspect to this, flooding incidences, particularly surface water flooding could increase. Health infrastructure resilience is applicable. The M25 which the scheme proposes to divert is utilised by the emergency services for example, including when local roads/bridges are flooded so any surface water flooding changes need to be considered in the context of health emergency response amongst other disciplines. • *PINS ID 75: Significant effects associated with aviation fuel storage within the health assessment;* It should be noted that local authorities do receive complaints concerning fuel odour from the airport, and it remains an issue of concern to residents.

Introduction

Para	Section Title	Comment
1.1.2	Project Background	Inclusion of M25 J14–15 works, A4 and A3044 rerouting, and flood storage parcels risks diverting traffic and flood flows into Spelthorne. Request borough specific modelling of traffic redistribution and hydraulic impacts.
1.3.1 & 1.3.3	EIA Scoping Addendum Approach	*'Changes in baseline conditions have informed the approaches presented and full baseline information will be presented in the ES.'* SBC are concerned that there will not be a further consultation stage prior to the ES, such as a PEIR. Failing to consult on the detail of the baselines prior to the ES and therefore at a stage where the majority of environmental modelling will be complete, does not give Local Authorities an opportunity to comment on the baseline in time to ensure our requirements are considered within technical modelling for air quality, climate change, flooding, acoustics or for land contamination assessment.

1.3.5	EIA Scoping Addendum Approach	*'It should be noted that stakeholder engagement with statutory consultation bodies, such as Natural England, has resumed. As was the case prior to the project pause in 2020, this engagement will include discussion regarding the detailed assessment methodology of individual environmental aspects as necessary'* There are some aspects of the ES chapter disciplines where local authorities have statutory functions, and therefore should be consulted such as local air quality, noise impacts and concerning land contamination and public health. Consultation is required on the technical assessment methodology's beyond the very basic level given a scoping, for example via workshops on technical matters so that local authorities can participate in the consultation process effectively, given from the paragraph above it sounds like there has already been consultation with some statutory consultation bodies. States that statutory consultation has resumed with Natural England. When will consultations with other statutory consultees recommence?
Table 1-2	Summary of Updated or New Policy or Guidance Documentation Introduced Since the EIA Scoping Report was Published	The regional planning policy section is only referring to London policy. Given the area set out as a study area within the application documents goes beyond London borough boundaries, wider regional and local should policy be considered for all the areas potentially affected. Areas beyond the London boundary will be impacted with regards to traffic and transport, noise, land quality, odour and air quality. It is appropriate that policy and guidance captures all the documentation that is relevant to the discipline study areas.

The DCO Project

Para	Section Title	Comment
3.4.2 & 3.4.4	Development Programme and Construction	*'It is anticipated that the enabling works described within the EIA Scoping Report would be undertaken between approximately 2030 and 2034. The airfield expansion between approximately 2030 and 2054 with the runway operational in 2035, and the campus development to be from approximately 2030 and fully developed by 2054.'* *'The ES will assess construction effects over the revised timescales, ensuring that the topic assessments such as air quality, noise and transport remain robust and reflect updated phasing'* There will be data uncertainties associated with the latter years of the phasing to be addressed in the technical assessments for air quality. For example, uncertainties in traffic emission factors, aircraft fleet and associated emissions. Appendix Part 2 paragraph 1.1.2 refers to reliance on the reasonable worst case assessment principle to deal with uncertainty but does not

		outline that approach in more detail for example to produce a conservative assessment. Will emission factors be held at an earlier year than the assessment year. And how will certainties in background projections be addressed, would the same principle be applied of holding backgrounds an earlier year when it may be assumed that for example traffic fleet emissions are less improved than they would be in the future assessment year, thus building in reasonable worst-case assumptions. What data sources are informing future predictions of aircraft engine performance in the future and what assumptions are being made by the percentage of sustainable aviation fuel in use in the modelling exercise for air quality. This is not explained in the technical methodology given in the scoping documentation. Have aircraft manufacturers being consulted for relevant emissions data, and how has that been incorporated?
3.5.1	Operation of the Airport	The statement indicates that there will be no changes to operations beyond those proposed in 2018. No detail is given as to what that means in terms of aircraft movements for example. How will the implications of expansion at Gatwick be assessed?

Approach to the EIA including EIA Scoping

Para	Section Title	Comment
4.5.6	The Airspace Change Process and Proposed Approach	The approach described utilising indicative flight paths is not explaining whether there will be any sensitivity testing in terms of considering a conservative assessment/worst-case scenario of the flight paths for air quality and noise. Without such a sensitivity test it could be the situation that the outcome of airspace changes result in worse air quality or noise than is being assessed in the ES, therefore it would be reassuring if a conservative principle could be applied to the assessment such as a sensitivity test.
4.6.2 & 4.6.4	Waste and Resources	*'Where re-use or recovery of CDE material is not possible, application of the waste hierarchy will be undertaken with the final option divert this to landfill within the DCO Project site (subject to appropriate treatment, materials management and permitting)'* It is important that Local Authorities are consulted on how waste is processed and disposed of especially regarding any on development site landfill. What documentation would secure consultation? It would be necessary to secure appropriate land contamination validation for review by local authorities after the waste treatment/recovery works have been completed. Waste Management Strategies are attributed to contractors, but the matters above need to secured by the DCO therefore the applicant will

		retain responsibility. Will the contractors' strategies in preliminary form be part of the application process, if not how will they be secured and at what point will local authorities be consulted upon the strategies? *'Within the description of the development, the ES will present details of the type and nature (including the anticipated quantum) of waste arising during construction and once the DCO Project is operational, including details of management and associated infrastructure or upgrades proposed as part of the DCO Project if they are required.'* The applicant has not identified where permitting by the Environment Agency would be required. Will that be covered within the ES?
4.6.5	Consideration of Potentially Significant Effects – Air Quality	The impact of onsite waste processing could include particulate pollution from processing soils, this should be covered by the air quality construction dust assessment to ensure appropriate mitigation is applied. Onsite waste processing will involve plant/equipment emissions which should be assessed and addressed by following relevant guidance for both air pollutant and odour emissions, and greenhouse gasses. As a mitigation measure and given the emphasis on design-based mitigation to avoid emissions, the applicant should commit to maintaining the London guidance standards of Non-Road Moveable Machinery emissions across the project.
4.6.5	Consideration of Potentially Significant Effects - Land Quality	The scope of consideration of significant effects should include interactions with ground gases that may arise from areas of historic landfill being worked by the project, and from areas of land contamination such as hydrocarbons that may be encountered during the works.
4.6.6	Waste Management Capacity	Expansion of Heathrow airport will generate a growth in the generation of waste outside of the operations of Heathrow Airport Ltd, associated with the freight industry and other expansion affiliated businesses and additional population needs. There will be more passengers travelling via public transport and passing through nearby towns such as Staines-upon-Thames when transitioning from rail to bus services. Should the economic effects not be considered first before scoping out the need to make further assessment on waste management capacity. Clearly a project designed to stimulate the economy and create additional employment is going to generate more waste locally which requires processing capacity. 4.6.12 seems to imply there will be further assessment.

4.6.11	Supporting Documentation	SBC are pleased to see the inclusion of a Materials Management Plan, a Resources Management Plan, a Code of Construction Practice and a Sustainability Strategy. SBC would request to be consulted upon the content of these documents.

Air Quality and Odour

The 2018 scoping report referred to an Air Quality Expert Review Group (AQERG). What is the current status of this group, and will they retain the roles previously described? The 2018 Scoping Report referenced the Air Quality Expert Review Group – a group consisting of experts from four UK universities to provide independent advice focussed on approach and methodology and preliminary consultation prior to wider stakeholder engagement. Will this group provide technical scrutiny over the modelling? If so, would it not be appropriate to include an industrial specialist with appropriate ADMS experience on strategic infrastructure projects in the group going forwards.

There will be changes in how aircrafts taxi around the existing runways and the new runway and additional terminal. How will this be accounted for in the air quality assessment? Appendix 5.1 Dispersion modelling methodology refers to 3. Aircraft engine ground running and testing, It is not clear whether the methodology includes aircraft that are travelling to and from the runway.

Appendix 5.1 Dispersion modelling methodology 1.1 Sources overlooks several sources adjacent to the airport such as hotels and related car parks that could be expected to develop with the scheme in place. Additional delivery traffic, private hire traffic to hotels and servicing traffic travelling to the development itself and associated businesses once the scheme is operational don't seem to have been included.

Future scenarios 1.2.16 refers to peer review of predictions around fleet that was currently underway in 2018. Has that work continued, or is it complete? No comment on this seems to have been given in the scoping addendum.

Para	Section Title	Comment
Table 5-1 & 5.4.11	Air Quality and Odour	Reference is given to the London Plan and the associated commitment to assess PM2.5 against the 2005 WHO guideline. It is the policy of SBC, via a commitment under a Council motion to put air quality information into the context of the current WHO guidelines, for example within annual status reporting. The applicant is encouraged to consider the latest WHO guidelines and give residents a comparison to them within the air quality assessment. It is understood the WHO guidelines are not statutory guidelines, however given the local policy it would enhance the assessment and make it more useful to residents if that context was given. For example, within the air quality assessment or within the health assessment where health-related WHO guidelines are relevant.

		Paragraph 5.4.11 refers to an assessment level of 20 mcg/m³ which differs from that stated above and in paragraph 5.4.15. Will both values will be assessed against?
Table 5-1	Air Quality and Odour	The IAQM (2024) Guidance on the Assessment of Dust from Demolition and Construction v2.2. is referred to. This will require demolition activities to be scoped in for assessment.
5.4.2 – 5.4.4	Proposed Approach and Methodology - Construction Study Area	This section refers only to dust assessment. There could be impacts from construction traffic on local air quality, especially bearing in mind the length of this construction programme. With the change in order limits has the construction study area for transport modelling been modified? There is no inclusion/ consideration of increased emissions from existing traffic flows due to delays and diversions caused by construction activities. This could see increased queue times at key junctions, have implications for junction capacity and increased congestion, leading to higher emissions. Due to the scale of the construction, the delays and disruption to the highway network would be ongoing for an extended length of time and therefore could be significant and not a brief, fleeting temporary effect. The traffic and transport chapter of the scoping report sets out that this assessment will assess highway network delay). With the delay impacts being modelled for traffic impacts, then the dataset will be available for inclusion in the air quality modelling, and therefore it should be scoped in for both the construction and operational phases of the air quality assessment.
5.4.8	Baseline Data Updates Required	*'No baseline monitoring supplementary to that described above has been undertaken. Monitoring of dust, particulate matter and odour may be undertaken in advance of the commencement of the construction programme, if deemed necessary by the risk assessments.'* There are no existing continuous monitoring stations providing coverage in the southern assessment area (including the nearby communities of Staines, Ashford, Egham, Bedfont, Feltham and Hanworth), and no roadside continuous monitoring stations to the south of the airport at all. This was highlighted during the previous 2018 scoping exercise. Given the southerly shift of surface access to the airport and the new airport related development to the south of the airport, it is reasonable to anticipate that the southern half of the core assessment area will see the largest negative impacts on air quality with the DCO scheme.

		Therefore, further baseline monitoring data should be collected from this area, particularly to inform the baseline air quality and health assessments.
5.4.9	Baseline Data Updates Required	*'Heathrow Airport is currently funding ongoing monitoring of Ultrafine Particles (UFPs), as part of their contribution to this growing area of research, but UFPs are not assessed in the context of the DCO Project,'* The Applicant should commit to an independent specialist reviewing the strategy for UFP monitoring taking into account the expansion plans, and make a commitment to regularly reviewing on an ongoing basis including post expansion as to whether further actions such as further monitoring are required to meet any future targets, or evidence of levels that should be achieved/kept beneath to protect human health. It should be noted that the current ultrafine particulate monitoring station is not in a residential area and is at a close distance to one runway that is not going to be representative of the 3 runway source arrangement/ configuration post expansion, and it does not represent cumulative exposure that could be expected within surrounding communities with a 3 runway scenario. It should be noted that a reliance on Sustainable Aviation Fuel to reduce particulate emissions does not mean a reduction will be achieved when offset against the increased number of aircraft movements. SAF is used as a blend as a percentage of the aircrafts fuel, and it will not offset the increase in ultrafine emissions of the increase in flights proposed under the expansion plans.
5.4.14	Proposed Approach to Assessment – Human Health Receptors / Assessment Criteria	*'Pending publication of the new guidance, Defra advises applicants to provide evidence that they have identified key sources of air pollution within their developments and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as possible. More detailed assessment is expected for developments closer to populations and/or having higher emissions.'* The statement given doesn't express how the application is going to address this advice/requirement. This would be a key aspect of reducing the impact of the scheme on health given the challenges in mitigating emissions once they have taken place. SBC are expecting to see further scope on this. Will there be any assessment of the expansion developments contributions to $PM_{2.5}$ levels regionally? Given the nature of this development involving increased aircraft movements, it may have relevance to wider regional compliance especially given the approval of expansion at Gatwick.
5.4.16	Proposed Approach to Assessment – Human Health Receptors /	*'Section 5.9 of the 2018 EIA Scoping Report broadly sets out the proposed approach to the assessment. Due to the long construction period and phased implementation of the DCO Project, and the high level information regarding the phasing at the time of writing, a high-level summary of the likely assessment scenarios was provided*

	Assessment Methodology	*that aimed to capture the worst-case impacts of the DCO Project throughout its implementation. This approach, as described in the EIA Scoping Report, which remains valid, and is reiterated as the following scenarios:* *• Current baseline;* *• Release of first phase of capacity under the existing Airport layout;* *• Year of maximum effects from construction activities;* *• Future baseline;* *• Year of third runway opening;* *• Year of maximum air quality effects;* *• Year of maximum ATM capacity and/or Project related road traffic flows; and* *• Further interim assessment years, as required in relation to proposed* *phasing, to ensure the reasonable worst-case impacts are assessed.'* How will uncertainties in data projections be addressed to ensure a conservative assessment, given how far into the future some of the traffic and aircraft emissions data and predicted baselines will be?
5.4.18	Proposed Approach to Assessment – Human Health Receptors / Assessment Methodology	Note that the frequency of construction and demolition dust inspections must be at least twice daily for these to be effective, it is expected that these frequencies will be reflected in submissions of CEMP documentation. SBC strongly discourages the use of Heras style fencing around materials storage areas, or excavation, construction or demolition areas. This is because such fencing, even with debris netting is ineffective at preventing dust moving off the site. CEMP documentation should include text to ensure that stockpiles do not exceed the height of fencing/boundary hoarding and that materials are not crushed above that height. Where materials are worked at height such as during demolition, specialist dust suppression will be required such as arm mounted dust suppression. CEMP documentation should include information on how each construction site/work area will have an adequate supply of water for dust suppression. It should be noted that SBC discourages the use of bowsers as these are ineffective. They take considerable time to refill and if they are the only method available there should be at least two or more of them as on a work front at all times. This is so that one can be filled whilst the other is in use. It is expected that work fronts that don't have a reliable supply of water via a piped supply, will have an adequate tank supply to facilitate dust suppression. CEMP documentation should also consider site dewatering and the requirement to prevent pollution when working in areas of historic landfill when dewatering, noting that permission to discharge may be required from the Environment Agency.

		SBC expected that equivalent documentation To a CEMP and COCP will be secured and provided for mineral extraction activities to ensure an approach to dust and noise that reduces the risk of causing statutory nuisance or health impacts. The applicant should put in place measures to ensure that residents can identify HGV vehicles related to the scheme, for example through the use of vehicle signage. This is to ensure that vehicles can be easily identified should they be part of the works. This is important as a measure to ensure that HGVs stay on the assigned access routes.
5.4.21, 5.4.22 & 5.4.25	Proposed Approach to Assessment – Human Health Receptors - Air Quality Neutral / Air Quality Positive	London AQ Neutral and Positive policy where not explicitly mentioning airports does apply to transport and buildings within developments and therefore SBC would consider that the principal of achieving improvements to air quality and offsetting transport and building emissions still applies, and therefore the guidance should be applied.
5.4.24	Proposed Approach to Assessment – Human Health Receptors / Air Quality Neutral	*'Heathrow Airport will continue to engage with relevant stakeholders throughout the application and design process to agree any mitigation measures deemed appropriate. It is recognised that air quality is just one of numerous environmental and other aspects (such as transport) where ongoing engagement and financial commitments are required, so it is deemed appropriate to consider these together and not in isolation.'* SBC look forward to being consulted on appropriate mitigation.
5.4.27	Proposed Approach to Assessment – Ecological Receptors	*'The air quality modelling of traffic emissions will rely on the outputs from the Heathrow Highway Assignment Surface Access Model (HHASAM), a bespoke strategic highway assignment model developed specifically for the purpose of assessing the impacts of expansion of Heathrow Airport. Within this area, air quality predictions will be made wherever a change in traffic greater than 1,000 vehicles per day or greater than 200 Heavy Goods Vehicles is predicted within 200 m of a designated site which is sensitive to air pollution. For European sites, these criteria will be applied to the development both alone and in-combination. For SSSIs, ancient woodlands, and local sites, they will be applied only to the development alone.'* There are road alignment changes, and junction modifications within the development that will alter average speeds potentially. These factors should also be considered in determining the model coverage for both the local receptors and ecological receptor air quality modelling.
5.5	Summary of Potentially Significant Effects	The operational phase does not include any account of emissions from on-site generation of heat and electricity to power the airport. Expansion of the airport will require additional energy plant. The scoping report has not included this within the air quality chapter as neither a likely significant impact nor an impact to be scoped out.

		Land based activities in the operational phase should also include emissions from airside vehicle movements. The operational phase includes vehicular traffic associated with the Airport. However, the effect is restricted to emissions from vehicles on public highways – this should include vehicle emissions from all landside roads at the airport (and within the AQ core assessment area). The existing Western, Northern and Southern Perimeter Roads together with roads into the Central Terminal Area and other terminal accesses are not public highways. Whilst some of these road links will be lost under the DCO scheme some will remain, and others may be provided.

Biodiversity

Para	Section Title	Comment
Table 6.1 & 6.5	Relevant changes in legislation, policy and guidance for the Biodiversity Assessment	The changes highlighted as a result of the Environment Act 2021 indicate the Project's commitment to delivering Biodiversity Net Gain (BNG). It draws attention to an expectation for mandatory BNG regime for NSIPs being in place by the time of the DCO application, but this element needs to be covered more fully in the event that the regime is delayed and it should outline an alternative for securing adequate BNG. Table 6.1 highlights that the use of the Statutory Biodiversity Metric to calculate BNG may result in a shortfall of uplift within the Order Limits and therefore additional provision off-site (in line with the draft Biodiversity Gain Statement published in the recent consultation) could be needed. The outcomes of the BNG assessment and potential shortfall needs careful consideration, particularly in terms of identification of significant effects, and to ensure appropriate compensation and mitigation. A reasonable strategy for delivery of BNG should be accounted for in Surrey's LNRS, expected to be in place by 2026. Continuing engagement and alignment with the emerging LRNS will be needed to achieve this.
6.3	Stakeholder Engagement	The bodies highlighted for engagement appear reasonable, but under relevant LPAs, the emerging Unitary Authority in Surrey (resulting from Local Government Reorganisation) should be included.
6.4.2 6.4.3	Proposed approach methodology	It is stated that further data gathering is needed to inform the DCO application and that while the approach to assessment outlined in the 2018 EIA Scoping Report is broadly valid, refinements will be needed to reflect up to date guidance. It would be useful to see further detail about the proposed refinements.
6.4.4	Study Area – general approach	The general approach to defining the Study Area, as set out in the 2018 EIA Scoping Report is noted, plus inclusion of land within the updated order limit and an additional buffer zone of 500m around the South West London Waterbodies SPA, which is welcomed. This buffer zone may include Staines Reservoirs and other areas of biodiversity importance in SBC, such as Staines Moor SSSI. The EIA

		should have regard to relevant environmental legislation and Council's latest policy, as set in the Local Plan (2024-2039, currently awaiting the Inspector's Report following Examination) Policy E2.
6.4.5 6.4.6	Study Area – air quality effects	The extent of the study area, defined as within 200m of roads carrying traffic accessing/ egressing Heathrow, should be reviewed in light of SBC's response on Air Quality and Odour (in particular 5.4.27) and the report's appendices Part 1, para 5.4.9. The latter outlines a potential deficiency (a missing step) in the air quality modelling methodology which could result in it under predicting pollutant concentrations.
6.4.26, 6.4.27, 6.4.28	Baseline updates - Disturbance to wintering birds	Disturbance surveys and counts for wintering birds on South West London Waterbodies SPA and Ramsar for the winter 2025/26 are welcomed. Expected impacts on wintering birds due to potential increased disturbance linked to Heathrow's development needs to be properly assessed, and mitigation and compensation measures developed as appropriate.
General comment / 2018 Scoping Report	Staines Moor SSSI	It is noted that Staines Moor SSSI is omitted in this Addendum report, but is adequately covered in the 2018 Scoping Report in terms of biodiversity (survey programme & need for habitat condition assessment) and water environment, recreational facilities and landscape & visual amenity.
General comment (Biodiversity loss and offsetting)	Colne Valley Regional Park - Stanwell Moor and Staines Moor	As outlined in the HSPG Sept 2025 response and the Colne Valley Park's CIC Sept 2019 response, there is a need to minimise land take from green space that forms part of the Colne Valley Regional Park, which includes Stanwell Moor and Staines Moor (SSSI) to its southern extent. Permanent loss of large areas of green space is strongly opposed, as it would detract from the valuable natural resource and multifunctional benefits (to biodiversity, local residents' recreation, amenity and physical activity) that the green spaces are protected for. As highlighted in those responses mitigation and compensation falls a long way short of what is required to offset the adverse effects arising from the loss of significant areas of the Colne Valley Regional Park. An adequate mitigation and compensation strategy should be developed before DCO, and include detail on adequate biodiversity offsetting relating to the scale and permanence of adverse impacts. As outlined in SBC's comments on the Executive Summary of this report, there is a need for a clear masterplan going forwards, including further detail about the land for a new park, and other improvements to ensure certainty about GI provision and access.
General comment (Biodiversity loss)	Construction compound near Staines Moor	One proposed construction compound lies near Staines Moor (SSSI, valued for its wetland ecosystem) and therefore the project must assess and minimise impacts on this sensitive site. While it is acknowledged that construction will bring some jobs, negative impacts must be mitigated to prevent lasting harm. Appropriate compensation and phasing of works will also be needed, and effective communication about these. The absence of a clear Code of Construction Practice in Heathrow's initial plans was noted as a deficiency and having a stringent code in place is vital so that issues

		like noise, dust, working hours, and disruption to both wildlife and the community are minimised and managed.

Carbon and Other Greenhouse Gases

Para	Section Title	Comment
7.2.1	Legislation, Policy and Guidance	Energy Strategy should be required, current terminology is "anticipated but has not yet been finalised or formally secured". Should also integrate Energy Strategy with any future Surrey Area Energy Plans. Spelthorne BC or local planning authority should be consulted on any future constraints on the electrical capacity of the area.
7.2.1	Legislation, Policy and Guidance	Scope recognises construction, ground operations, and flight emissions but does not present borough level GHG accounting. Request quantification of construction HGVs and workforce travel emissions within Spelthorne.
Table 7-2	Proposed Amendments to Carbon and Other Greenhouse Gas Assessment Approach	Indirect surface access GHG emissions are proposed to be excluded. For Spelthorne, local traffic rerouting and workforce commuting must be included to test borough Net Zero 2050 alignment.
Table 7-2	Proposed Amendments to Carbon and Other Greenhouse Gas Assessment Approach	Reliance on Jet Zero "High Ambition" scenario should be sensitivity tested against slower technology or SAF uptake, as decarbonisation and local effects could be underestimated.
7.5.7	Summary of Potentially Significant Effects	Non-CO_2 effects such as contrails and NO_x are excluded from quantification. Request at least a qualitative borough level risk narrative for climate policy consistency.
7.5.11 & 7.5.12	Summary of Potentially Significant Effects	*However, non-CO2 impacts which may result from the operation of the DCO Project will be clearly described and assessed qualitatively within the ES. For context, the issue was examined recently in relation to the Luton Airport DCO, where the ExA concluded that "non-CO2 emissions are a neutral matter and neither weigh for nor against the making of the Order" (London Luton Airport Limited, 2024, para 3.12.109).* *Addressing non-CO2 impacts is one of the six core policy measures set out in the Government's Jet Zero strategy for aviation and is subject to substantial research and collaborative working at international level (for example in 2024 ICAO held its inaugural symposium on non-CO2 aviation emissions). The ES will therefore seek to demonstrate that the design and operation of the DCO Project does not conflict with UK Government and international aviation industry efforts to reduce non-CO2 impacts of aviation*

		The text acknowledges NOx and SOx as a non-CO2 impactor. What form of assessment will be applied to NOx and SOx in terms of its climatic effect? Will it be based upon the air quality modelling as a regional assessment in the same fashion as the wider study area referred to in the climate chapter? Is it not applicable to consider Nox and SOx mitigation both from a climate and air quality perspective as being something that should be embedded at the design stage. No reference is made to the role of particulates other than SOx such as black carbon's impact on climate however they do have a role, and so would the same need for regional assessment not apply to particulate emissions.

Climate Change

Para	Section Title	Comment
Table 8-1	Relevant Changes in Legislation, Policy and Guidance for the Climate Change Assessment	Heathrow's Fourth Climate Adaptation Report will inform assessment, but borough scale outputs are absent. Request publication of borough specific adaptation implications.
8.4.10	Proposed Approach to Assessment	Assessment will use UKCP18 high end projections. Request borough level resilience testing of Spelthorne's roads, utilities and schools against RCP8.5.
8.4.11	Approach to Environmental Measures	Commitment to a Climate Change Adaptation Plan noted. Request that this plan includes borough specific KPIs, monitoring and sign off by Spelthorne.

Community

Para	Section Title	Comment
9.3	Stakeholder Engagement	To ensure an up-to-date stakeholder engagement with relevant bodies, the following should be added to the stakeholder list detailed in the 2018 EIA Scoping report (para 9.3.5) - Active Surrey to the regional body stakeholder list (point 2) - Family centres to the list (point 5) - Hospitals to 5d - Volunteer Bureau's to point 5 as they will liaise with all the voluntary sector organisations
9.4.20	Baseline Updates Required	Relating to baseline updates needed, surveys of user recreation facilities relating to point 7 f from 2018 Scoping Report, The Colne Valley Way. Assume it will include the whole of Staines Moor from Staines through to Stanwell Moor which is a SSSI.

		There is also **Hithermoor Stream** which runs through Stanwell Moor. There is a public trail/footpath. I believe this was created by the Environment Agency. There is also **Cordelia Recreation Ground (also known as Long Lane Rec).** This is the largest recreation ground in Stanwell and includes play area, skate park, and courts. There are other recreation areas but assume they will fall under the open space assessment in section 8.

Economics and Employment

A comparison of Heathrow's 2018 Scoping Report with the 2025 EIA Scoping Report Addendum reveals a shift in emphasis. In 2018, economic issues such as job creation, housing pressures, and SME supply chain opportunities were explicitly treated within the "Economics and Employment" chapter. By 2025, many of these themes have been displaced into the "Community" chapter or omitted altogether. Temporary employment effects, workforce-driven housing demand, and property market impacts are now marginalised, while supply chain opportunities and SME resilience are scarcely developed. Surface access improvements once assumed integral, particularly Southern Rail Access have disappeared, and the Western Rail Link remains uncertain.

This reframing of risks underplaying the full economic consequences for Spelthorne. The Borough already contributes significantly to Heathrow's workforce, with c.3,500 residents employed at the airport, and this could rise substantially with expansion. The promise of 26,000+ new on-site jobs and up to 10,000 apprenticeships by 2030 represents a major opportunity however, unless commitments are quantified and localised, there is a risk that Spelthorne residents will not capture their fair share. At the same time, competition for labour could drain staff from the Borough's retail, care, and hospitality sectors, leaving SMEs struggling to compete on wages. Construction activity will generate thousands of temporary jobs, but experience shows that without local labour obligations, many will be filled by outside contractors.

Property and housing pressures are another critical omission. Expansion will bring new workers and their families into the housing market, fuelling demand and potentially driving up rents and house prices in an already pressured area. Rising commercial rents could displace established local firms, particularly SMEs, unless mitigation is introduced. These issues were recognised in 2018 but are absent from the 2025 Addendum, weakening the economic baseline.

Transport infrastructure remains a decisive factor. Heathrow's economic case depends on improved surface access, yet Southern Rail Access has been dropped, the Western Rail Link is uncertain, and Heathrow's plan now relies heavily on expanded car parking. These risks worsening congestion in Spelthorne, with overspill parking in Stanwell and Staines, and traffic displacement during decades of construction. Without binding commitments to deliver rail connectivity and protect local roads, the Borough faces significant economic disruption.

No information is provided whether Heathrow expansion will align with carbon budgets.

The Government's 2025 approval of Gatwick's Northern Runway included robust obligations: surface access "gating" linked to mode-share targets, a £20m Employment, Skills and Business Fund, and dedicated community and housing mitigation funds. These set a precedent and Spelthorne BC believe Heathrow should be required to deliver equivalent binding commitments, with ring-fenced funds and enforceable governance structures.

Spelthorne BC require guarantees on skills, housing, transport, compensation, and sustainability.

Para	Section Title	Comment
Ch. 10 (2018 §10.4)	Economics & Employment	2018 report recognised risk of labour market distortion with airport jobs attracting staff away from local retail, care, and hospitality. This issue is not revisited in 2025 Addendum. Request ES explicitly assess local sector impacts and mitigation (support for SMEs, wage monitoring). In 2018, economic issues such as job creation, housing pressures, and SME supply chain opportunities were explicitly treated within the "Economics and Employment" chapter. By 2025, many of these themes have been displaced into the "Community" chapter or omitted altogether. SBC is concerned that temporary employment effects, workforce-driven housing demand, and property market impacts are no longer receiving the same level of attention in the report, while supply chain opportunities and SME resilience are scarcely developed.
Ch. 10 (2025)	Economics & Employment	2025 Addendum notes job creation but lacks quantified commitments on apprenticeships, degree apprenticeships, and T-levels. Request ES include specific targets for local residents, with monitoring. Spelthorne BC require commitments to specific targets and accessible to ensure a fair allocation of new jobs and apprenticeships are offered to local Spelthorne residents, particularly youth and disadvantaged groups. Spelthorne BC require local labour obligations to ensure our local residents benefit from the job opportunities.
Ch. 10 (2018/2025)	Economics & Employment	Construction jobs referenced, but insufficient recognition that contractors may import external staff. Request local labour obligations, apprenticeship quotas, and on-site training partnerships with local colleges. Spelthorne BC require commitments to specific targets and accessible to ensure a fair allocation of new jobs and apprenticeships are offered to local Spelthorne residents, particularly youth and disadvantaged groups. Spelthorne BC require local labour obligations to ensure our local residents benefit from the job opportunities.
Ch. 10 (2025)	Economics & Employment	Housing and public service pressure from additional workers noted superficially. Request ES provide detailed modelling of housing demand, affordability, and impacts on healthcare/education capacity, with mitigation commitments.
Ch. 10 (2018)	Economics & Employment	2018 report recognised potential supply chain opportunities for SMEs. Addendum does not update or quantify. Request Heathrow

		commit to SME procurement targets and local supplier engagement programmes. Spelthorne BC require commitments to apprenticeships in construction trades, and use of local supply chains for materials, to ensure the construction phase boosts the borough's local economy.
Ch. 10 (2025)	Economics & Employment	Air freight growth noted as economic benefit, but Addendum omits potential HGV congestion and local road impacts. Request ES consider logistics corridor impacts in Spelthorne and propose freight consolidation centre strategy.
Ch. 10 (2025)	Economics & Employment	Freeport or customs innovation potential not referenced. Request ES consider scope for Freeport designation at Heathrow and benefits to local economy. The Council recognise this issue is not specifically related to expansion.
Ch. 10 (2018/2025)	Economics & Employment	Neither report assesses commercial property market. Expansion could raise rents, displacing SMEs in Spelthorne. Request ES consider impacts on local business space affordability and mitigation (e.g. safeguarded SME space, rate relief). Rising commercial rents could displace established local firms, particularly SMEs, unless mitigation is introduced. These issues were recognised in 2018 but are absent from the 2025 Addendum, weakening the economic baseline.
Ch. 10 (2025)	Economics & Employment	Housing market effects mentioned but not developed. Request ES explicitly model property price and rental effects for Spelthorne residents.
Ch. 9 (2018/2025)	Community	Both reports reference community disruption but omit detailed economic impacts of prolonged construction (to 2050). Request Code of Construction Practice address business continuity, traffic disruption, and compensation for lost trade.
Ch. 9 (2025)	Community	Stanwell Moor construction site (CS11) and HGV routing threaten village economy and quality of life. Request ES assess localised economic impacts and require dedicated haul routes, timing restrictions, and mitigation funding.
Ch. 9 (2025)	Community	Construction traffic and road closures likely to reduce footfall in Staines town centre and other high streets. Request economic assessment of retail trade impacts and inclusion of mitigation package.
Ch. 10 (2018/2025)	Economics & Employment	Economic benefits are predicated on surface access improvements. Request ES scenario-testing of outcomes with/without Southern Rail Access, WRLtH, and M25 junction upgrades. Heathrow's economic case depends on improved surface access, yet Southern Rail Access is no longer referenced in the documentation, the Western Rail Link is uncertain, and Heathrow's plan now relies heavily on expanded car parking. This risks worsening congestion in Spelthorne, with overspill parking in Stanwell and Staines, and traffic displacement during

		decades of construction. Spelthorne BC require binding commitments to Southern Light Rail, enhanced bus routes from Spelthorne towns directly into Heathrow, and measures to discourage through-traffic (like physical restrictions or partnerships with navigation apps to prevent routing through village roads).
Ch. 9/10 (2025)	Community/Economics	Southern Parkway (22,000 spaces) risks inducing car traffic and overspill parking into Spelthorne. Request ES evaluate displacement parking impacts and fund Controlled Parking Zones (CPZs).
Ch. 9 (2025)	Community	M25 realignment and M4/M25 junction upgrades pose risk of construction disruption and congestion spillover. Request ES provide traffic modelling for Spelthorne routes (A30, A308) and mitigation commitments.
Ch. 9 (2018/2025)	Community	Noise: 2018 report acknowledged effects but 2025 Addendum omits cumulative health/productivity impacts. Request ES quantify economic costs of noise (lost productivity, health burden) and mitigation.
Ch. 9 (2025)	Community	Air quality: Addendum recognises risk of worsening but insufficient assessment of economic health costs. Request ES quantify productivity losses and NHS cost implications for Spelthorne.
Ch. 9 (2025)	Community	Loss of 220ha Green Belt in Spelthorne (4.3% of borough) acknowledged only as land use. Request ES assess economic value of green space loss (property desirability, recreation, wellbeing impacts).
Ch. 9 (2025)	Community	Compensation proposals exclude Stanwell Moor/Village buyouts despite new significant impacts. Request ES consider property value impacts and expand compensation to affected communities.
Ch. 9 (2025)	Community	Community Compensation Fund structure not clearly favouring most impacted areas. Request ES commit to proportional allocation with Spelthorne priority funding.
Ch. 10 (2025)	Economics & Employment	Neither report incorporates Brexit impacts on trade, customs processes, or labour market. Request ES update economic baseline to reflect post-Brexit realities.
Ch. 10 (2025)	Economics & Employment	COVID-19 not referenced. Pandemic altered aviation demand patterns and hybrid working trends. Request ES re-forecast demand and employment based on revised industry projections.
Ch. 10 (2025)	Economics & Employment	Net Zero 2050 legislation and carbon budgets since 2018 not fully integrated. Request ES demonstrate how expansion aligns with CCC carbon caps and implications for long-term job security.
Ch. 10 (2025)	Economics & Employment	International precedents (Frankfurt night ban, Paris CDG cancellation, Schiphol caps) omitted. Request ES consider lessons learned and risks to Heathrow's projected economic case.

Please refer to Appendix 2, particularly sections 1 and 2, for further details.

Historic Environment

Para	Section Title	Comment
11.1.1	Introduction	Noted that the consideration of what is the 'historic environment' remains unchanged.
11.4.2	Study Area	The core study area should be updated to reflect change in DCO boundary.
11.4.9	Baseline data updates	SBC has no new statutory or locally listed heritage assets. However, Stanwell Village has significant existing archaeological sites, listed and locally listed buildings whilst Stanwell has similar heritage assets and a Conservation Area, including the Grade I Listed St Marys Church and Lord Knyvett's Schoolhouse, a Scheduled Ancient Monument. As such, liaison with SBC in relation to locally listed buildings and Conservation Areas and liaison with the Surrey County Council Archaeology Officers (Historic Environment Planning) is essential.
11.5	Summary of Potentially Significant Effects	All measures to protect Heritage Assets and their settings should be taken.

Health

Para	Section Title	Comment
12.3.1 / Table 12-1	Baseline Data Sources	Surrey has undertaken a recent Joint Strategic Needs Assessment regarding air quality (Air Quality | Surrey-i).
12.4.1	Approach to Environmental Measures	Wording of vulnerable groups needs to include section for people with long term health conditions
12.5.1	Summary of Potentially Significant Effects	Further relevant strategies and data sources: • Health and wellbeing strategy | Spelthorne Borough Council •Leisure Strategy - Leisure and parks - Spelthorne Borough Council •Sport England 10 year strategy, up to 2035, to transform communities through sport and physical activity Uniting the Movement | Sport England *NHS England » NHS mental health dashboard*
Table 12-2	Potential Health Effects Scoped in during the Construction and Operational Phases	References particulate matter but not specifically ultrafine particulates. Ultrafine particulates are of particular concern to the community as referenced in Heathrow's own community consultation work via CISHA Air Quality — CISHA. Ultrafine particulates (UFP), should remain scoped in for health impacts.
Table 12-2	Potential Health Effects Scoped in during the Construction and Operational Phases	Risks to construction workers from exposure to contamination in soil - what is the justification for scoping this out?

Landscape and Visual Amenity

Para	Section Title	Comment
13.3	Stakeholder Engagement	New and updated engagement is required with SBC to reflect changes in landscaping within the Borough since the 2018 EIA Scoping Report.
13.4.4	Methodology - Study Area	The EIA scoping report proposes to reduce the study area from 5km in the previous EA to 1km in new EA. This is too low and will not ensure all impacts upon SBC will be considered. SBC has various SPA/ Ramsar sites, SSSI's and SNCI's which require consideration, some of which fall outside of the 1km range.
13.4.10	Baseline updates	SBC is at a late stage in adopting a new Local Plan where sites may be removed from the Green Belt. This has the potential to allocate new housing in locations within the zone impacted by development at Heathrow.

Land Quality

Para	Section Title	Comment
14.3.2	Stakeholder Engagement	Re-engagement meetings only been carried out with Natural England and the Environment Agency in May and June respectively? All statutory consultees should be given opportunity to re-engage with the project team.
14.3.4	Stakeholder Engagement	PFAS compounds are commonly encountered at airports, large industrial facilities (including petrochemical storage) and landfills. Ubiquitous within the environment they can bioaccumulate in humans and other species. Whilst highly mobile in the aquatic environment PFAS compounds have a low/ moderate sorption to soils. The deposition of PFAS compounds through air around the above facilities and processes can also occur. The presence of PFAS compounds within soils can pose a potential human health risk and should therefore be considered alongside controlled waters in generic/ detailed quantitative risk assessments.
14.4.6	Proposed Approach and Methodology	Will the re-engagement with stakeholders including Spelthorne be used to assess changes to baseline data?
14.4.9	Proposed Approach and Methodology	Where additional ground investigations are carried out to validate baseline date presented in the Desk Study, Spelthorne would welcome early engagement in discussions of the proposed scope of works prior to works commencing within the borough.
14.4.12	Proposed Approach and Methodology	The Council disagrees that the current proposals not to provide a breakdown of ground investigation data and provision of interpretative reports by Local Authority area still conforms to the 2018 EIA Scoping Opinion. The justification that ground investigation data will not be provided by Local Authority due to PINS only recommending not requiring that approach is not accepted.

		Land is categorized by its contamination status, historical land use and the identified (potential) risks to Human Health, Controlled Waters etc. The potential Source-Pathway-Receptor scenarios have the potential to be weakened if the entire DCO Project land is considered as one zone.

Major Accidents and Disasters

Para	Section Title	Comment
15.1	Introduction	The report does not reference Heathrow Airport Ltd's designation as a Category 2 responder under the Civil Contingencies Act 2004. This statutory duty is central to its obligations in emergency preparedness, business continuity, and information-sharing with Category 1 responders.
15.2	Legislation, Policy and Guidance	The current National Risk Register (2023) is not cited. The scoping should demonstrate how the NRR's priority risks (e.g. extreme weather, CBRN, power disruption, malicious attack) have informed the hazard assessment and mitigation planning.
15.3	Stakeholder Engagement	There is no reference to consultation with the relevant Local Resilience Forums (London Resilience Forum and neighbouring Surrey LRF). Heathrow's major-accident and disaster risk assessments should be informed by the Community Risk Registers and multi-agency emergency arrangements of these LRFs, with clear commitment to joint planning, exercising and mutual-aid agreements.
15.4	Construction & Operation Phase Hazards	The hazard scope appears narrow. It should explicitly consider: (i) aviation-fuel pipelines and storage – rupture, leak, fire, environmental contamination; (ii) mass-casualty transport incidents – including aircraft incident on- or off-site and mutual-aid for temporary mortuary capacity; (iii) terrorist / malicious-attack scenarios including MTA and insider threats; (iv) pandemic or biological hazards – lessons from COVID-19; (v) severe-weather impacts on power, access and passenger-management; (vi) critical-infrastructure dependencies (power, water, IT/telecoms) and the consequences of their loss during an emergency.
15.4	Construction & Operation Phase Hazards	No reference is made to COMAH-regulated sites, the Pipeline Safety Regulations 1996 or off-site emergency plans for aviation-fuel infrastructure. These should be assessed for potential major-accident hazards and environmental consequences.
15.4	Construction & Operation Phase Hazards	The report does not reference relevant aviation emergency-planning standards such as CAA CAP 168 and the Airports (Fire & Rescue Services) Regulations 1999, which underpin emergency preparedness and response at UK aerodromes.
Table 15-1	Construction & Operation Phase Hazards	Operational detail to include: • Need for cross-border mutual-aid and surge capacity (e.g. mass-fatality arrangements, temporary mortuary contracts with partners such as Kenyon's, rest-centre and bottled-water provision for displaced passengers/residents). • Explicit linkage to reservoir-breach modelling (Thames Water) and flood advisory groups. • Need for traffic-management and emergency ingress/egress coordination with LRF static traffic plans and blue-light services.

		• Reference to loss-of-utilities or industrial-action scenarios impacting safety-critical workforce and passenger welfare.
Table 15-1	Construction & Operation Phase Hazards	Consideration of drought-related impacts on fire-fighting water supply and on bottled-water prioritisation for vulnerable residents versus airport demand – to be addressed with water-companies and fire service.

Noise

Para	Section Title	Comment
16.1	Relevant Legislation	The table refers to Civil Aviation Act 1982, further Civil Aviation Acts came into force in 2006 and 2012. These 1) widened and modernised the powers available to the government to control noise at airports and 2) permitted airport operators to improve differential charges based on aircraft noise emissions. These needed to be included in the table. Other Relevant UK legislation and planning guidance that should be considered including in the table. 1. Aeroplane Noise Regulations 1999 dealing with noise certification for aircraft, referencing the noise limits issued by ICAO and restricting operations where noise limits are exceeded. 2. Professional Practice Guidance on Planning and Noise (Pro PG) published jointly by the ANC, IOA and CIEH. This document is guidance for acoustic practitioners, planners and developers with the aim of protecting through good design. This has relevance for new developments in areas around Heathrow airport that are affected by aircraft noise. The UK Department for Transport (DfT) and the Civil Aviation Authority (CAA) are due to release the Aviation Night Noise Effects (ANNE) Study (expected late 2025). This major study examines the link between aviation noise, sleep disturbance and annoyance at different times of the night. Its results are intended to inform future policy on night flights at major designated airports like Heathrow. The outcome of this study should be considered in the Preliminary Environmental Information report (PIER) and the Environmental Statement (ES).
16.3	Engagement with Stakeholders	There has been no stakeholder engagement taken since 2018, Engagement with Local Authorities would have been beneficial especially for officers who were not involved in the original Heathrow expansion consultations.
	Note the comments below also relate to the corresponding paragraphs in the 2018 EIA Scoping Report (as referred to in the current Addendum paragraphs)	
16.4.2	Construction Noise – Study Areas Point 1.	The proposed study area discussed in the paragraph extends to 300m from any construction activity, this appears below expectation in instances where substantial nighttime works, pilling or use on a concrete crusher, for example, are envisaged because areas outside the 300m study area may be subject to adverse effect. This will need to be checked

		and verified against the overall objective of including any location likely to experience an adverse effect from noise.
16.4.2	Construction Noise – Study Areas Point 3	100m has been identified as the greatest distance over which vibration from construction activities will need to be assessed. In section 16.9 it states that construction vibration is scoped out of this study. Can we get more clarity on this? Construction vibration can affect people causing physical symptoms such as nausea, dizziness and pain and psychological effects such as anxiety, sleep disturbance and stress. Vibration should not be scoped out of study before it is properly assessed, and consideration should be given to the size of the study area as 100m appears on the low side.
16.4.4	Construction Noise – Study Areas	Agree that study areas must as a minimum encompass all areas within which construction noise is likely to be above the Lowest Observed Adverse Effect Levels (LOAEL) based on worst case figures.
16.4.5	Operational Noise – Study Areas	Paragraph 16.4.5 discusses the study area for operational noise, the principle that the study areas should as a minimum, encompass all areas within which operational noise is likely to be above LOAEL. Noise contours will need to be plotted down to at least the LOAEL, which will cover a substantially larger area. This appears a reasonable approach.
16.4.5	Operational Noise – Study area Point 5	For operational vibration, the indicated area is 85m from site activity. The scoping report must confirm that this is an adequate extent to cover Ground borne noise effects may be adverse over a greater distance, the extent of the study area needs to reflect this.
16.4.5	Operational Noise – Study Area Point 4	We agree that changes in traffic flows on existing roads and railways (indirect effects) should be studied. This is especially relevant on road and railways where the increase/decrease in road or traffic volumes or traffic types, caused by the operation of the DCO project, would be likely to cause a change in noise levels exceeding 1dB during both daytime and nighttime periods. Clarity should be given on noise mitigation/measures which will be taken to protect our residents from an increase in noise levels caused by an increase in traffic volume and or changes in traffic types. This should especially focus on roads close to residential properties.
16.6	Baseline Conditions	There have been no changes to the information in the baseline condition section of this report since it was first submitted in 2018. Quoting 2016 baseline aircraft noise data as the most recent is incorrect. These data sets are crucial to the definition of the baseline conditions and must reflect current baseline conditions. LPA's should be able to consult on the baseline figures prior to them being presented in the PEIR. It is noted that there is no subsequent consultation planned in for this purpose. Consulting on current baseline figures will give LPA's, the opportunity to consider whether further or more detailed baseline noise data or a modified data collection methodology is required to properly characterise the existing noise environment.
16.4.10 & 16.4.11	Proposed Approach to the Assessment -	*With reference to section 16.10 and paragraph 16.10.19 of 2018 EIA scoping report and construction noise levels being determined at noise sensitive receptors for a worst case typical month (LAeq, T, where T = 1 month)*

	Construction Assessment Methodology	1. The same value of LAeq T at two receptors may mask quite different noise experiences if one is subject to relative steady state noise and the other is exposed to a time varying series of transient or impulsive noise events. It is recognised that currently there is little or no information available in the timescales and nature of the construction activity to be undertaken, but it is not entirely reasonable to discount the necessity or advisability of assessing construction noise using additional shorter-term metrics such as LAeq, 1h or Lmax. When further information on the construction methodology is available, this issue must be revisited and a more comprehensive approach to assessing noise effects be adopted if necessary to quantify the full range of effects likely to occur and the types of mitigation best suited to dealing with them.
16.4.12 & 16.4.13	Aircraft Noise assessment methodology	*Civil Aviation Authority's CAP1616 Airspace Design: Guidance on the regulatory process for changing airspace design including community engagement requirements, 2017* is not the most recent version. The most recent is CAP 1616 version 5.1 published in September 2025.
		For operational assessment on aircraft noise, is it proposed to use the Lmax outputs only to assess potential sleep disturbances during the nighttime period? Daytime Lmax values are also intrusive when considering a full range of impacts on noise sensitive receptors such as schools, nurseries etc. Daytime Lmax should be added to the operations assessment matrix.
16.4.14 & 16.4.15	Aircraft Noise – Ground Noise	Clarification is needed as to whether this does include engines being run, sometimes at high power, for test purposes and against what standards would this particular source be assessed?
16.4.15	Aircraft Noise – Ground Noise	Paragraph 16.10.51 of the 2018 EIA Scoping Report describes how ground noise levels for aircraft will be established. Clarification is needed. 1. Distinction will need to be made between noise generated by main engines and noise generated by Auxiliary Powered Units (APUs). Not only will these have different noise characteristics, but they are sources at different heights above ground level, which affects propagation. For new generation aircraft not yet in operation, how will noise levels from main engines at low power (sufficient only to manoeuvre the aircraft around the airfield) be determined as compared to those generated by existing, nosier variants? This is a very important issue with regard to air noise, particularly on departure when engines are operating close to maximum power, but it can also be expected to materially affect ground noise calculations.
16.5	Summary of Potentially Significant Effects, links to	16.10.77 of the 2018 EIA Scoping Report - reference is made to table 16.7 which defines values for the Significant Observed Adverse Effect Level (SOAEL) for different noise sources. It also defines values for the Lowest Observed Adverse Effect Levels (LOAEL). However, it does not

	the Methodology for Identifying Significant Effects in 2018 EIA Scoping Report	reference the Unacceptable Adverse Effect Level (UAEL), a critical benchmark outlined in government policy. The UAEL represents a level of noise impact that must be proactively prevented due to its unacceptable effects on individuals. Although Table 16.6 includes UAEL values, it does not delineate the specific interventions required to prevent UAEL-level impacts, nor does it distinguish these from the measures intended to mitigate significant adverse effects associated with SOAEL.
16.5		16.10.81 of the 2018 EIA Scoping Report - stated that significant effects on health and quality of life are identified in line with government noise policy. More information will be needed on specific mitigation to reduce SOAEL and UAEL. On site monitoring of noise during the construction will be expected to ensure levels are not exceeded and the correct noise mitigation is in place.
	Assessment framework / Screening Criteria – Noise Non Residential	16.10.139 of the 2018 EIA Scoping Report, Table 16.10 sets out screening criteria for non-residential receptors. Hospitals and hotels are rightly assigned nighttime screening criteria, but given the risk of individual flyovers generating Lmax values high enough to interfere with sleep, there should be a screening standard set for this metric.
16.4.29 onwards	Assessment framework /Proposed approach to the assessment Residential receptors.	16.10.99 of the 2018 EIA Scoping Report *Aircraft noise and ground noise are covered in the same category and assigned the same values for LOAEL and SOAEL. Although it is helpful to understand the cumulative effect of different noise sources these two noise sources should also be separated as they have different characteristics.*
16.4.29 onwards	Proposed approach to the assessment Residential receptors.	16.10.99 of the 2018 EIA Scoping Report - *Agree in principle that that study areas must as a minimum encompass all areas within which construction noise is likely to be above the LOAEL.*
16.4.29	Assessment framework – primary and additional factors	16.10.106 of the 2018 EIA Scoping Report *Primary factors- #1, #2 and #3 are to be considered in combination, the implication is that they are considered in that order. There is an argument for promoting change in noise exposure to #1 (from#2) as this assessment is primarily about changes to the noise climate around Heathrow arising from a new third runway.*
16.4.29	Assessment framework – primary and additional factors	16.10.106 point C of the 2018 EIA Scoping Report, - *With regard to identifying significant effects at noise levels between LOAEL and SOAEL, it is not clear in point C what is actually meant.*

Traffic and Transport

Para	Section Title	Comment
17	Traffic and Transport	Given the 7 days a week nature of operations at Heathrow how will this be reflected in the traffic data produced as an input to the air quality modelling?
17	Traffic and Transport	There is no mention of any sensitivity testing or scenario covering in combination effects of the expansion of Gatwick Airport. Gatwick expansion will impact upon coach services and traffic flows on the M25. The River Thames Scheme may have a cumulative impact upon traffic during that scheme's construction phase, however this is not mentioned within the scoping documents.
17.4	Highway Links and Highway Junctions	How will the screening differ for the traffic data used for air pollutant dispersion modelling, for example such a link as described in 17.4.16 (*'Any link with a forecast high proportional change in traffic due to a low absolute baseline will be screened out.'),* should still be scoped in for air pollutant dispersion modelling purposes so transport data would still be required for such a link. It is important the traffic model covers the data required for an air quality assessment. It's not coming across in the chapter on traffic and transport how the differing needs of the two assessments will be taken into account, which should be explained as the traffic inputs to the air quality modelling will be based on the transport model. The approach to scoping in junction modelling risks a data gap where a junction may not meet the capacity criteria described in the scoping chapter, but may still need to be included in the air pollutant dispersion modelling. How will ATC data feed into the estimation of average speeds for the air quality modelling traffic dataset? DfT guidance for transport modelling treats speeds differently to the requirements for air quality dispersion modelling, for air quality modelling average speeds that consider congestion will be required for all model links. The applicants methodology for producing road link speeds for the air quality modelling should be given.
17.4.21 & 17.4.15	Public Transport Network	How will delays to bus journeys during the construction be assessed? There will be changes to bus user demand as a result of the development that should be assessed. Buses and coaches remain an important method of public transport for both employees and travellers at Heathrow. There is an emphasis on distance, however journey time is also an important characteristic of public transport use.
17.4.5	Proposed Approach	Will queue length and delay data be incorporated into the air pollutant dispersion model for example by dropping traffic speed in

	Methodology - Baseline	areas that have been identified in the traffic model as being subject to delay and queues, for example on the approach to junctions? There is no proposed inclusion/ consideration of increased emissions from existing traffic flows due to delays and diversions caused by construction activities. This could see increased queue times at key junctions, have implications for junction capacity and increased congestion, leading to higher emissions from baseline traffic flows. Due to the scale of the construction, the delays and disruption to the highway network would be ongoing for an extended length of time and therefore could be significant and not a brief, fleeting temporary effect. With the delay impacts being modelled for traffic impacts, then the dataset will be available for inclusion in the air quality modelling, and therefore it should be scoped in for both the construction and operational phases of the air quality assessment.
17.4.23	EIA Scoping Report Addendum Expanding Heathrow	SBC request to be consulted on the draft Code of Construction Practice (CoCP) and Surface Access Strategy (SAS).
17.3.2	17. Traffic and Transport,	Construction traffic acknowledged. Request binding Construction Traffic Management Plan with HGV routing restrictions, workforce travel plans, and enforcement for Spelthorne.
17.4.14	17. Traffic and Transport,	Screening thresholds may exclude local roads with large percentage increases on low baselines. Risk of underestimating impacts on Spelthorne residential streets. Request borough level screening annex.
17.4.12	17. Traffic and Transport,	Bus and coach services screened using a 400 m distance threshold. For Spelthorne, changes to stop locations, capacity and crowding must also be assessed with mitigation measures.
17.4.2 – 17.4.7	17. Traffic and Transport,	Non-Motorised Users are acknowledged but borough pedestrian right of way and cycleways may face disjointing. Request design guarantees for safe segregated crossings and cycle links in Spelthorne.

Water Environment

Para	Section Title	Comment
18.1	Introduction	Scope unchanged from 2018. Spelthorne contains sensitive flood areas. Request borough specific flood modelling and justification for exclusions.
18.2	Legislation, Policy and Guidance	Updates include Environment Act 2021, Environmental Targets (Water) Regulations 2023, Water Framework Directive guidance, ANPS, NNNPS and NPPF. Request explicit alignment with local policy and Spelthorne Local Plan water policies.

18.2.10	Legislation, Policy and Guidance – Climate Change Allowances	Environment Agency's updated climate change allowances from May 2022 will be applied. Spelthorne request the use of upper end UKCP18 scenarios and borough scale flood extents.
18.3	Stakeholder Engagement	Engagement resumed with Environment Agency, Natural England and Lead Local Flood Authorities. Request Spelthorne Local Planning Authority and Lead Local Flood Authority role formalised in methodology sign off.
18.4	Proposed Approach Methodology	Study area remains Thames River Basin Management Plan. Baseline to be updated with new Environment Agency datasets including Flood Map for Planning, surface water maps and Water Framework Directive classification. Request borough specific hydraulic modelling and baseline mapping for Spelthorne watercourses.
18.4.9	Proposed Approach Methodology – Baseline Updates Required	New monitoring required including 12 months of groundwater and surface water quality, flow gauging and groundwater levels. Request monitoring sites located in Spelthorne with results shared with the Local Planning Authority.
18.4.13	Proposed Approach to Assessment – Assessment Methodologies	Flood Risk Assessment, Water Framework Directive, surface water and groundwater risk assessments to be undertaken. Request borough specific outputs and publication of flood storage proposals within Spelthorne.
18.5	Summary of Potentially Significant Effects	Tidal flood risk confirmed to be scoped out after Environment Agency agreement. For Spelthorne, fluvial and surface water flood risks must be modelled and mitigation demonstrated especially around Ashford, Stanwell Moor and Staines.

Cumulative Effects Assessment

Para	Section Title	Comment
19.1.5	Introduction	The identification of cumulative effects based upon approved schemes excludes at this point in time the potential expansion of Gatwick Airport despite that scheme meeting the Tier 2 (projects on the Planning Inspectorate's programme of projects) description in the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. The expansion of the nearest large regional airport will impact upon the scheme, upon travel between the two airports and potentially traffic on the M25. There is a considerable amount of technical information about the Gatwick proposal in the public domain that having progressed further through the DCO process. Gatwick expansion should be considered as a scheme that could result in a cumulative effect. There could also be cumulative impacts upon emissions of both air pollutants and greenhouse gases and upon noise.

		The River Thames Scheme may have a cumulative impact upon traffic in Spelthorne, especially regarding HGV's which may be relevant to the construction phase air quality and noise assessments. As per the comment above the applicant should be setting out whether this is specifically included as a Tier 1 or Tier 2 scheme.
19.1	Introduction	The cumulative impacts need to consider existing consents at Heathrow Airport, and the easterly alternation application alongside plans for Gatwick Airport. The plans for expansion at Gatwick Airport introduce additional considerations for cumulative impact assessment, particularly in relation to both environmental effects and long-term aviation demand. The potential development of a second runway at Gatwick could lead to overlapping impacts on air quality, noise, surface access, and carbon emissions across the Southeast region, especially when considered alongside Heathrow's proposed expansion. Furthermore, there remains uncertainty around whether long-term passenger and freight demand can sustainably support additional runways at both airports. This raises an issue about the optimal distribution of capacity and the potential for overprovision, which must be carefully evaluated within the cumulative assessment framework. Spelthorne needs to be confident all relevant projects and consents are factored into the cumulative impacts assessment.
19.2	Legislation, Policy, and Guidance and 8. Climate Change Chapter	Limited integration of climate change adaptation - While climate change resilience is addressed in a separate chapter, cumulative climate risks (e.g. heat stress, flood risk from multiple developments) are not explicitly integrated into the cumulative effects assessment.
19.4	Proposed Approach and Methodology	Intra-Project effects - The EIA states that intra-project effects will be considered only where not captured in the technical chapters. However, complex interactions may be underrepresented without a dedicated overview. A matrix could help identify high-risk groups or locations for example considering the overall impact of noise + air quality + health + community stress.
19.4	Proposed Approach and Methodology	Lack of spatial visualisation of cumulative zones of influence (ZOI) - The methodology refers to ZOIs for each environmental aspect, but no maps are provided in the Addendum. Spelthorne would want to see GIS-based visualisation of cumulative impact zones, especially for transport, noise, and air quality.
19.4	Proposed Approach and Methodology	Monitoring – SBC support the iterative nature of the cumulative assessment and request: • Ongoing involvement in refining the CEA scope and methodology • Access to interim findings and draft assessments • Participation in stakeholder workshops and technical review panels This will ensure that Spelthorne's interests are represented and that the assessment remains responsive to emerging data and policy.
19.4	Proposed Approach and Methodology	Airspace changes and non-co_2 impacts - SBC note that airspace design is now led by UKADS. Spelthorne requests:

	and 5. Air Quality/Noise Chapters	• Scenario-based assessment of air noise impacts on our communities • Qualitative consideration of non-CO_2 aircraft impacts, including contrails and ultrafine particulates These should be addressed transparently in the ES.
19.4	Proposed Approach and Methodology	Inclusion of local projects in the cumulative assessment - Note that Tier 1 developments within 1km of the Order Limits are to be included in the cumulative assessment. SBC requests confirmation that all relevant local projects are included in the "Long List" of developments and can provide a summary for the SBC area. SBC suggest early engagement with Spelthorne officers to ensure all relevant schemes are captured and appropriately assessed.
19.5	Summary of Potentially Significant Effects	Cross-Boundary impacts on Spelthorne -Given SBC proximity to Heathrow, we expect cross-boundary cumulative impacts to be significant. These include: • Air Quality: Impacts on receptors in Stanwell, Ashford, and Sunbury. • Noise: Aircraft and surface transport noise affecting residential and educational receptors. • Health: Combined effects from noise, air pollution, and stressors on vulnerable populations. The Environmental Statement (ES) should include specific modelling outputs for receptors within Spelthorne and that these are shared with the Council for review.
19.5	Summary of Potentially Significant Effects	The EIA relies on the 2018 PINS conclusion that transboundary effects are not significant. Given changes in airspace design, emissions, and international aviation policy, this should be revisited, even if only to confirm the initial conclusion.
19.5	Summary of Potentially Significant Effects	Environmental measures and mitigation – SBC welcome the inclusion of land for environmental mitigation and enhancement. Spelthorne seeks to engage with HAL on: • Green infrastructure delivery within and adjacent to the borough • Flood risk mitigation measures • Noise mitigation measures • Opportunities for biodiversity net gain aligned with local nature recovery strategies We recommend joint working to identify shared mitigation opportunities and ensure local benefits are maximised.
19.5	Summary of Potentially Significant Effects and 9. Community Chapter	Community, housing, and public services - The cumulative effects on community infrastructure must be fully considered. SBC are particularly concerned about: • Housing demand and affordability pressures • Capacity of schools, healthcare, and social services • Impacts on community cohesion and vulnerable groups SBC suggest that the ES includes a Community Impact Assessment that integrates findings from the Equality Impact Assessment (EqIA) and reflects local demographic trends and service capacity.
19.5	Summary of Potentially Significant	Transport and infrastructure effects - The proposed modifications to the M25 and rerouting of local roads (A4, A3044) may have knock-on effects on traffic patterns in Spelthorne. We seek clarity on:

	Effects and linked to 17. Traffic & Transport Chapter	• Traffic redistribution and congestion impacts • Public transport capacity and service changes • Impacts on active travel routes and public rights of way • Road safety and junction performance SBC suggests that cumulative transport impacts be assessed in coordination with Surrey County Council and local transport authorities.
19.5	Summary of Potentially Significant Effects	Waste infrastructure - The EIA scopes out operational waste impacts on capacity, citing Heathrow's Zero Waste policy. However, the closure and relocation of the Lakeside Energy from Waste facility could have knock-on effects on waste infrastructure. Spelthorne should ensure this is tracked in the Commitments Register and considered in the cumulative infrastructure planning.
19.5	Summary of Potentially Significant Effects and 10. Economics/Community Chapters	Limited scope for indirect socioeconomic effects - The EIA proposes to scope out indirect effects such as those from tourism, economic growth, and imported air freight, citing a lack of causal certainty. Spelthorne may experience pressures from increased economic activity, such as: • Housing demand and affordability • Pressure on public services • Localised business displacement Appreciating these effects, while complex given the scale of the project could be qualitatively assessed or flagged for monitoring.
19.5	Summary of Potentially Significant Effects and 5. Air Quality Chapter	Non-CO_2 aviation impacts not quantified - The EIA acknowledges non-CO_2 impacts (e.g. contrails, NOx, SOx, ultrafine particulates) but excludes them from quantitative assessment due to scientific uncertainty. Given emerging research and public health concerns, Spelthorne may wish to request a more detailed qualitative assessment, especially for receptors near flight paths.

Scoping Report Appendices: Part 1

Para	Section Title	Comment
5.4.9	Appendices Part 1	The approach to model coverage is not set out in terms of how links around a receptor will be modelled to ensure all sources that are relevant to that receptor are included in the model and the need to represent the façade of the receptor closest to the nearest road within the modelling is not covered. Will there be areas where the receptor faceting process needs to consider a nearby runway source? The air quality modelling methodology does not set out the approach to establishing the model link network. The established method is to model road sources within 200 metres of a sensitive receptor or verification monitoring site, where such a receptor/site is located within 200 metres of an affected link (affected links being those determined by the screening criteria given under 5.4.9). This method then captures the influence of the nearby roads that are not within the affected road network but are crucial to determining the pollutant concentration at a receptor (or monitoring sites utilised in the

		verification process). Without this step of establishing the wider model link network beyond the affected links determined during screening, the model will under predict pollutant concentrations, and the verification will be poor. This technique has previously been used within DCO assessments, see Great Yarmouth Third River Crossing Application for Development Consent Order Document 6.2: Environmental Statement Volume II: Technical Appendix 6C: Local Air Quality Modelling and Model Verification, paragraph 1.1.9. where it is stated that the air quality dispersion model included a model network defined as: '*the addition of all roads for which traffic data is available within 200m of the sensitive receptors that are located within 200m of an affected road.'* (https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR010043-000472-6.2%20Appendix%206C%20-%20Local%20Air%20Quality%20Modelling%20and%20Model%20Verification.pdf) And The Lake Lothing (Lowestoft) Third Crossing Order Document 6.3: Environmental Statement Volume 3 Appendices Appendix 8B Local Air Quality Modelling and Model Verification, Table 0-1 Data Inputs to the ADMS Roads Dispersal Model '*To include all the road sources within the traffic data set provided that may influence pollutant concentrations at identified sensitive receptors, receptors within 200m of each 'affected road' meeting the affected roads criteria detailed in ES Chapter 8 Paragraph 8.4.16 were selected. The coverage of the network of modelled road sources has been determined by selecting all roads with traffic data that fall within or intersect an area of 200m around a sensitive receptor location.'* *(TR010023-000312-6.3 - ES Vol 3 - App 8B - Local Air Quality Modelling & Model Verification.pdf)* The applicant should define their approach to establishing the model link network and provide figures showing affected links and the model links within the ES to demonstrate the traffic emissions dispersion modelling has been undertaken effectively.
14.4.2 & 14.4.4	Appendices Part 1	The study area refers to all of the land being considered for the DCO Project and a 500m buffer area extending outwards. This description is not clear as to whether it includes areas that are being utilised for construction and storage. There may be contamination discovered in the course of such a development that involves a plume, therefore a caveat is needed to ensure that such matters should they arise will result in an appropriate extension of the study area.

		It is assumed that the study area will be updated based on the change in the project area presented within the scoping addendum.
Table 5.8	Appendices Part 1 - Likely significant air quality and odour effects	The receptor locations referred to do not include children's nurseries. Nurseries should be included as a location of the very young who are vulnerable to exposure to air pollution. Medical facilities are referenced; residential care homes should also be included.
5.9.18 & 5.9.19	Appendices Part 1: Pages 1 – 750 Construction vehicle and plant emissions	No reference is made to construction generator emissions, SBC expect these emissions to be treated as a component of NRMM and thus included in the air quality modelling.
5.9.20	Appendices Part 1	Reference is made to source apportionment. With this data it should be possible to attribute separately the cost of health impacts for pollution from air traffic and pollution from roads.
5.10.32	Appendices Part 1	No reference is made to how car park emissions will be modelled. There is a methodology for including car parks within ADMS modelling. SBC expect that all car parks will be included within the air quality dispersion model scenarios, and that traffic flows to car parks will be considered within the scenario modelling for transport air quality and noise. The consolidation of car parking could generate significant traffic flows to the south of the airport, and the associated environmental impact needs to be assessed.
5.10.11	Appendices Part 1	Mitigation refers to 9. '*Physical means, including barriers to trap or better disperse emissions and speed control on roads'* Such measures should be included as scenarios within the air pollutant dispersion modelling as they could influence predicted pollutant concentrations at sensitive receptor locations.
5.10.13 & 5.10.17	Appendices Part 1	There are routes to Heathrow through Spelthorne that could be improved to better facilitate active travel, such as improvements to the railway bridge and pavements/segregation from traffic on Clockhouse Lane Ashford. This route needs improvement to accommodate pedestrians and cyclists safely on a key and very direct route to the airport.
5.10.25	Appendices Part 1	It is not clear from the text whether the southern access tunnel will be included within the air pollutant dispersion modelling and noise modelling as a scenario (and within transport modelling). SBC would request that it is included, as southern access would potentially have an impact on local air quality in Spelthorne.

5.10.33	Appendices Part 1	SBC should be a consultee regarding any consolidation of freight routes. Such consolidation should be subject to air pollutant dispersion modelling and noise modelling.
Table 14.2	Appendices Part 1: Engagement with stakeholders	Reference is made to a Human Health and Controlled Waters Risk Assessment. Local authorities should be consulted on this document as it develops.
14.9.4	Heathrow EIA Addendum Scoping Report Appendices Part 1: Pages 1 – 750 14.9.4	This section of the report refers to baseline data collection including site surveys. It is clear that extensive land quality and ground investigation data will be obtained by the applicant. Such data should be shared with local authorities given authorities human health remit in relation to land contamination.
14.9.7	Appendices Part 1	*'Ground investigation surveys will also continue beyond the DCO in order to support further evaluation and implementation of detailed design parameters and, where necessary, remediation options.'* Further consultation with stakeholders including local authorities should be secured where such surveys continue beyond the DCO.
14.10.8	Appendices Part 1: Construction assessment methodology and 14.10.8	Construction phase documentation should secure measures to ensure that erosion of landfill capping is prevented and that vehicles and plant are subject to rigorous cleaning procedures. This is to ensure that the risk of contaminated soil transferring between or leaving work fronts on vehicles and equipment is minimised. Supervision over work fronts by a suitably qualified specialist, for example a registered Specialist in Land Condition (SiLC) professional should be secured.
14.10.5	Appendices Part 1	*'Where required, remediation will be carried out to ensure that the resulting land is suitable for the future use of the land required for the DCO Project. Following completion of the remediation, the land should not be capable of being designated as Contaminated Land under Part 2A.'* It is best practise to consult local authorities as a stakeholder prior to undertaking remediation. This statement should be secured in the DCO. Submissions of documentation must be required to local authority land contamination officers, that detail the remediation that's been carried out and how the applicant has ensured the land is suitable for the future use and not capable of being designated as contaminated under Part 2A.

14.10.10	Appendices Part 1	The applicant should propose a robust sampling procedure for any materials that are to be reused to prevent cross contamination, for example post transport preplacement volumetric sampling. Vehicle and equipment cleaning procedures will be vital to ensuring that clean materials are not mixed with contaminated materials and should be secured to prevent further land contamination.
-	Appendices Part 1: Land Quality	Interactions with the former Esso pipeline and the current pipeline are not mentioned. The former pipeline has been decommissioned but there is the potential for residual ground issues should this be disturbed. The construction documentation should ensure measures are in place to deal with this should it be encountered, and that adequate measures are in place to protect the new pipeline. There is no mention at this stage as to whether further local pipelines would be required to support the expansion. Could the applicant clarify as to whether such infrastructure would be required.
14.3.1	Appendices Part 1	*'In preparing this Scoping Report, meetings have been held with a number of stakeholders to discuss the approach to the assessment as well as to obtain baseline environmental information and to identify any likely significant effects. A summary of the consultations undertaken to date for this purpose are presented in Table 14.2'.* As the above refers to meetings held in 2018 before the 2020 project pause and it has come to light that information from those initial meetings have not been included. Stakeholder engagement with Spelthorne and other local authorities should recommence as outlined within the column headed *Proposed future engagement*, (Table 14.2, page 424).
14.4.2	Appendices Part 1	Where the DCO project and 500m buffer area are subject change. Will this be reflected in the relevant assessments?
14.5.1 & 14.5.2	Appendices Part 1	What baseline information is currently being gathered, site specific data or desk based information? Will Spelthorne be consulted for further information? When will baseline information gathering focus on land to the south and east of the airport? Will Spelthorne be notified when information gathering commences to the south of the airport?
14.5.4	Appendices Part 1	When will baseline surveys to inform the scope of ground investigation works begin? Spelthorne would welcome early engagement in this process to review and comment on proposed scope of works on land within its borough.
14.6.38	Appendices Part 1	*'Principal contaminants produced by landfills and areas of infilling are in the form of leachate and landfill gas generated by decomposition of the organic components of the waste mass. The composition of the leachate at each location is highly dependent on the material deposited within the landfill'*. The statement that the composition of leachate at each landfill will be dependent on the composition of waste materials and age of the landfill further supports the argument that ground investigation data should be divided into Local Authority areas.
14.6.42	Appendices Part 1	Note Spelthorne Borough Council (through HSPG) have provided details on historic landfills within its borough.

14.6.49	Appendices Part 1	Following the publication of the LCRM, the preliminary risk assessment must follow that approach.
14.9.3 – 14.9.7	Appendices Part 1	Spelthorne would welcome early engagement in the further gathering of information to inform the preliminary risk assessment ground scope of ground investigation.
14.10.3	Appendices Part 1	Spelthorne would welcome early engagement in discussions on appropriate remedial measures where necessary.

Scoping Report Appendices: Part 2

Page	Section Title	Comment
Figure 14.20	Appendices Part 2	CSM – identifies tanks and fuel storage facilities. Historic tanks and fuel storage may have had associated leakage. This would require remediation during construction should soil /water contamination be found.
	Appendices Part 2 2. DISPERSION MODELLING (content as per EIA Scoping Report, Volume 3 Appendices)	SBC will require the coverage of the air quality dispersion model to meet guidance, for example where local roads meet the assessment criteria set in guidance they should be included in the model. The modelling methodology will be considering both aircraft emissions and transport emissions. There will be relevant point sources for example regarding heating and energy plant and engine testing ground run pens. The methodology does not describe how each element will be modelled or how those models will be integrated with each other in producing a predicted pollutant concentrations at sensitive receptors. The model verification section describes the use of continuous monitoring data for model verification purposes. There is only one continuous monitor to the South of the airport in Spelthorne, this site is not roadside, and the applicant is referred to LAQM.TG(22) guidance concerning this. That is not adequate coverage to give a valid verification. Verification based on a single data point for a large area is not best practice. No description of verification zoning is given. In that because the model is being treated as a single verification domain? LAQM.TG(22) 7.566 states the approach to undertaking separate adjustments within a model area in order to avoid over or under-predicting at the different types of location. It is understood that the project application is submitted in London, and that the London Technical Guidance therefore is relevant given devolution, however that guidance document has a lower level of content on verification and dispersion modelling than LAQM.TG(22). Given LAQM.TG(22) is Published by Defra and based on scientific principles, the lack of equivalent content in the London guidance doesn't then negate the need to consider the scientific guidance that is available in LAQM.TG(22). Noting that it is LAQM.TG(22) that is applicable in Spelthorne. Conditions around the M25 are likely to be different to conditions in other modelled areas for example. Utilising a single verification factor will not reflect the conditions and could lead to underestimation of impacts from traffic pollutant emissions.

		Without knowing the coverage of the area to be modelled in terms of scoping criteria, it's difficult to understand the approach that's being taken. No justification for the approach is given in the context of guidance, such as LAQM.TG(22) Defra guidance and LLAQM.TG(19). Further consultation is needed once the air quality modelling area has been defined. SBC are concerned the coverage of the transport model (3.2.16 notes this is based on modelling using strategic highway models) is not referring to a bespoke models that incorporate a greater resolution of traffic counts for local roads, and therefore that the air quality model may be too high level, and that impacts upon communities may not be adequately covered/captured. Will the existing bus station/future bus/coach terminals be part of the modelling exercise? TG22 states that '7.465 Note that if a bus station or bus stop is modelled as part of a wider area (part of a town or city centre), a separate model verification may be necessary for the bus station area alone (based on monitoring data from sites located near the station), while the rest of the model is verified with results from typical roadside monitoring sites.' Given the extent of the airport this approach may be relevant. Whilst as it is accepted that diffusion tubes are a less accurate technique then continuous monitoring LAQM.TG(22) does allow the use of diffusion tubes for verification purposes and utilising them would give better coverage than the current approach. It is common practise in relation to road related air pollutant emissions dispersion modelling to utilise diffusion tubes. SBC strongly advise that the applicant undertakes a targeted diffusion tube survey considering the needs of air quality model verification. Simply relying on local authority diffusion tube monitoring for a scheme of this size and duration is not best practice and carries the risk that coverage will not be adequate near to roads impacted by the design or within the transport model. There is time for the applicant to deploy suitable monitoring to ensure a robust data set for verification of the air quality model in accordance with Defra technical guidance and best practice, which requires a monitoring period of at least six months to capture cross seasonality. Local authority monitoring networks will not account for areas where there could be substantial changes with the scheme, such as car park entrance/exit locations or at junctions near to those locations. The transport section of the scoping addendum refers to potential micro-simulation modelling for junctions. Will this data be utilised in the air quality modelling exercise? What will the approach be to consideration of the one-hour objective for nitrogen dioxide given the multi source nature of the development? Will

		there be any Monte Carlo simulation to test for the impact of point sources on short term exposure? How will changes in road gradients and terrain with the scheme be accounted for in the dispersion modelling? Will there be changes to aircraft noise abatement procedures and if so how will this be assessed within the air quality assessment. Such procedures may have an influence upon and aircraft emissions at a relevant height to the assessment. No reference is made to the method for modelling car parks within the air pollutant dispersion modelling methodology. Given the locations of car parks it will be important to SBC that these are included in the modelling exercise, and that new car parking locations or expanded car parking locations those including utilised during the construction phase are taken into account when planning future monitoring strategies. The original scoping opinion from SBC highlighted that this should be included in the modelling however it doesn't seem to have been addressed in the scoping addendum. Ground run pen and on stand engine testing takes place within Heathrow as per Operational Safety Instruction Ground Noise at Heathrow – Approval, Control Process and Safety of Engine Ground Running 2025. Will this be included in the odour assessment? Will there be any changes to the testing regime for example the frequency of high-power and on stand runs with the expansion? If so, this should be accounted for in the air quality, noise and odour assessments. Will there be any correlations investigated between the social depravity index and health outcomes where impacts upon air quality are predicted as a result of this scheme? This will be relevant to the health chapter of the ES.
2.2	Appendices Part 2 Software	The methodology refers to ADMS airport to model aircraft emissions in relation to air pollutant dispersion. There are a range of setup configurations in ADMS airport to do this, offering different levels of complexity to represent aircraft sources both in how emissions are represented spatially and how aircraft emissions data are generated. The applicant should set out which options will be applied for the modelling of aircraft emissions in ADMS Airport. Will emissions data be calculated from IACO times in mode, from a preprepared inventory or from a flight performance model? Will aircraft emissions be represented as a single or multiple volume source or as a combination of aircraft volume, area and line sources? SBC has an expectation that both emissions calculations and spatial representation should be detailed given this is the approach that allows detailed concentration prediction.

		Will an APU and Ground Support Equipment Emissions Inventory be applied? How will airport static sources such as power, heating and fuel plant be represented in the modelling process. Will hourly annual profiles be applied to capture time varying emissions from aircraft and other sources within the model? Will the Complex Scenario approach detailed within section 4.2.5 of the ADMS Airport user guide be applied? (https://www.cerc.co.uk/environmental-software/assets/data/doc_userguides/CERC_ADMS-Airport5.1_User_Guide.pdf)
Figure 14.20	Appendices Part 2	CSM – identifies tanks and fuel storage facilities. Historic tanks and fuel storage may have had associated leakage. This would require remediation during construction should soil /water contamination be found.

Scoping Report Appendices: Part 3

Page	Section Title	Comment
3.1.4	Appendices Part 3	It is proposed that site specific data will be collected from sites 'suspected of contamination'. See comments on 14.3.1 above. Information provided by Spelthorne has not been included within the 2018 Scoping Report. Without that inclusion there is a risk that sites will not be subject to investigation as they are not considered/ suspected of contamination. All information provided at the previous stakeholder stages should be included and further engagement with the Council should be undertaken to determine what changes (if any) have occurred since the 2020 project pause.
3.1.5	Appendices Part 3	The published guidance must be updated to reflect the withdrawal of CLR 11 and publication of LCRM.
3.1.7	Appendices Part 3	Screening out of sites where no source, pathway or receptor is identified. Will Spelthorne be consulted on these decisions?
5.1.3	Appendices Part 3	Further clarity should be provided on the methodology, '*if soil samples exceed the chosen screening criteria used in the GQRA, then only these will be taken forward for further assessment'.* Does this mean just the soil exceedances will be taken forward or that that specific zone/ land parcel within which those exceedances fall will be subject to GQRA?
5.2.1 & 5.2.3	Appendices Part 3	The Council would prefer to see a hierarchy applied in which UK generic assessment criteria used where available and then derived criteria.
5.2.7	Appendices Part 3	*SP1010 Development of Category 4 Screening Levels for Assessment of Land Affected by Contamination Final Project Report (Revision 2)* defines $POS_{(park)}$ as an area of open space, usually owned and maintained by the Local Authority, provided for recreational uses including family visits and

		picnics, children's play area, informal sporting activities such as football (but not a dedicated sports pitch) and dog walking. It assumes that tracking back of soils to a place of residence will be negligible. It also assumes that $POS_{(park)}$ '*is considered to be a relatively large area (>0.5 ha) of predominantly grassed open space with no more than 25% of exposed soil*'. Will soft landscaped areas within the DCO project reflect these suggested land uses making the use of the $POS_{(park)}$ acceptable?
5.3.6	Appendices Part 3	Is the application of the commercial use GACgwvap to inform a GQRA appropriate to assessing offsite vapour risks to existing residential receptors?
5.4.2	Appendices Part 3	Statistical analysis is a useful tool but can lead to erroneous conclusions if not applied appropriately. Of primary importance is understanding the dataset in the context of the Conceptual Site Model. There must be confidence that the dataset adequately captures the characteristics of the site. Have averaging areas been identified on the basis of the CSM, were the sampling locations evenly spread and random (not targeted to suspected areas of contamination or point sources), samples taken from the same population, number of samples is sufficient to undertake statistical analysis. The 2008, CLA:IRE guidance has been superseded by the following *Professional Guidance: Comparing Soil Contamination Data with a Critical Concentration*, CLA:IRE, 2020 and should therefore be updated in the Scoping Report.
5.6.2	Appendices Part 3	Whilst the calculation of a characteristic situation is useful the assessor must also have a thorough understanding of the conceptual model and recognise conditions and risks at the site rather than relying potentially misleading maximum gas readings. Appropriate understanding of ground gas conditions will help inform decisions regarding a safe development, both for construction workers and future occupants.
5.7.1	Appendices Part 3	It will not be sufficient to simply cover asbestos containing soils with soft landscaping. Depth and risk of exposure will need to be fully quantified before a simple cover system would be acceptable. Spelthorne would welcome early engagement with the assessors to agree remediation approaches to ensure risks to human health are appropriately mitigated.
6.1.3	Appendices Part 3	It is disagreed that the '*assessment criteria for the reuse of materials and acceptance criteria for the use of imported soils will be derived separately from the HHRA process*'. It is essential that material (site won or imported) is suitable for its intended use and where that is for use in soft landscaped areas, must not pose a risk to human health. In addition to the provision of documentary evidence of the source of imported materials (imported materials), the scope of verification sampling of imported and/ or site won must ensure the materials are suitable for use. Unsuitable materials pose a risk to human health. The assessment to derive acceptance criteria for imported/ site won materials must therefore be included in the Human Health Risk Assessment stage and be fully documented in Remediation Strategies.

3.1.4	Appendices Part 3	It is proposed that site specific data will be collected from sites 'suspected of contamination'. See comments on 14.3.1 above. Information provided by Spelthorne has not been included within the 2018 Scoping Report. Without that inclusion there is a risk that sites will not be subject to investigation as they are not considered/ suspected of contamination. All information provided at the previous stakeholder stages should be included and further engagement with the Council should be undertaken to determine what changes (if any) have occurred since the 2020 project pause.

APPENDIX 1:

Heathrow Expansion Environment Impact Assessment Scoping Report 2018

Summary of responses from Spelthorne Borough Council (June 2018)

Introduction

This document provides a summary of Spelthorne Borough Council's (SBC) responses to PINs consultation exercise on Heathrow Expansion's Environmental Impact Assessment (EIA) Scoping Report to inform the preparation and completion of the Preliminary Environmental Information Report as part of the Development Consent Order (DCO) process.

General Comments

- Reference is given to the 'heavy rail' alignment, though not explicitly the 'light rail' (Southern Light Rail) which is a proposed alignment.

- The existing Planning Boundaries need respecting and the emerging Local Plan documentation of SBC needs to be fully considered.

- The current scoping provide an illustrative boundary, however, SBC reserves the right to challenge other components of the expansion masterplan, if sufficient consideration has not been given through the EIA.

- Paragraph 4.9.3 outlines that "several dedicated groups have also been established for the purposes of consultation and assurance for the DCO Project". The bullet points under this paragraph include the Heathrow Strategic Planning Group. Participation in this partnership, and the terms of reference of the HSPG group, does not include provision of assurance.

- The Executive Summary of the EIA Scoping Report states that "The components of the DCO Project are presented in this Scoping Report at a number of locations and in a range of design configurations. These design options were consulted upon in Heathrow's first public consultation on expansion, Consultation 1, undertaken between January and March 2018. The type and function of the components themselves are now well understood". The type and function of the components themselves and how they accumulatively impact and impinge upon the quality of life of residents is far from well understood. There needs to be a holistic approach in addition to component assessments.

***Question** 1. The environmental topics that should be included in the EIA*

General

Paragraph 2.2.17 (Volume 1, p29) discussed committed rails schemes, namely the Elizabeth Line. There is no mention here about the Network Rail Western Rail Link to Heathrow (WRLtHR) scheme, which has an Environmental Impact Assessment: Preliminary Environmental Information Report consultation with PINS at this moment in time. The WRLtHR is discussed in terms of rail noise in Chapter 16, e.g. para 16.6.17, but it is not discussed in the context of the DCO Scheme nor as a cumulative scheme outside of the appendices. Western Rail access has been considered as required for Heathrow to meet its surface access targets.

There is also no reference in any of the volumes about the renewal of the Esso Southampton to London Pipeline which delivers oil from its refinery in Fawley to the West London Terminal storage facility at Heathrow. A consultation on pipeline corridor options has just closed, and statutory consultation on the preferred route is expected in Autumn 2018 with an application to be submitted for a Development Consent Order in early 2019. The project timeline has commencement of construction works in 2021, and therefore construction works through Spelthorne will be on-going coincidentally to enabling works of this DCO scheme, if granted. Cumulative impacts of the pipeline scheme should be considered.

Paragraph 2.2.22 (Volume 1, p30) discusses current operations and in particular the Cranford Agreement. This section details that planning permission has been granted for the infrastructure necessary to implement the end of the Cranford Agreement, but that as yet the enabling works have not been done, so airport operations remain as under the Agreement (i.e. no runway alternation on easterlies). Neither the description of the existing site nor the Chapter on the DCO Project provide any clarification of when these enabling works would be undertaken. Will they now be included within the DCO Project, or would the changes be made ahead of the DCO application/ decision? The change will impact on the proportion of landings and take-offs experienced by communities under easterly operations, with commensurate impacts on noise, air quality and other community impacts.

Paragraphs 3.3.13 to 3.3.24 (Volume 1, pp41-43) discuss local road diversions. The options presented for diversion of the A4, A3044 and Stanwell Moor Road junction (Figures 3.7 to 3.9, Volume 2, pp 20-22) differ from the options being presented to HSPG as Masterplan Assembly Options. With respect to the A4 shortlisted options, only Option 6C features in the Masterplan Assembly Options, with a variant option on 3A (with differing junction connections to the M4 Spur) and new Options for taking the A4 east of the M4 Spur and reconnecting to the existing A4 via the bottom of the A408 Sipson Road. For the A3044 none of the four options set out in Figure 3.8 have been taken forward in the Masterplan Assembly Options – options 2A and 3G do not feature and the variants of options 2AI and 3D connect directly into the roundabout above Junction 14 of the M25 and not to Horton Road in the Masterplan Assembly Options. For the Stanwell Moor Road junction, EIA scoping options SMJ1 and SMJ3 do not

feature in Masterplan Assembly Options, which do include configurations not included in the EIA Scoping with a direct connection from Junction14 of the M25 into a proposed Western Parkway east of Stanwell Moor Road.

Similarly, all four options presented in the EIA Scoping Report for River diversions (from para 3.3.31, Volume 1, p45 and Figure 3.11 Conveyance options to retain river flows) are different from those being consulted on in the Masterplan Assembly Options. The scope of the EIA needs to be adaptive to encompass all options being taken forward as potential components as the scheme progresses towards a preferred Masterplan.

Paragraph 3.3.25 (Volume 1, p43) Other Road Network Changes does not include the option for Southern Road Tunnel access, which is discussed in paragraphs 5.10.25 to 5.10.27 (Volume 1, p144).

Paragraph 3.3.37 (Volume 1, p48) discussed Displaced Uses, including the Total Rail Head. This states that a re-provided rail head will be located on the Colnbrook branch of the Great Western Main Line. No plan(s) has been provided of the location options for this facility. Paragraph 3.3.37 also states that “The re-provided rail head will provide the principal import and export facility for earth and landfill, aggregates”. In contrast paragraph 5.10.5 (Volume 1, p140), is vague about the use of the railhead to transfer waste materials stating that “opportunities are being investigated”.

Paragraph 3.3.40 and Table 3.9 (Volume 1, p52) discusses airport related development. Improved clarity is needed about how much of future demand for these facilities will be provided within the DCO scheme, and how the remainder will be considered under cumulative assessment.

The EIA report will need to include more detailed timetabling of construction/ operational components and definitive construction sites in order to be able to properly assess significance, especially in relation to geographical areas and possible clustering of sites and activities temporally and spatially.

Improved clarity is need in Paragraph 3.3.38 (Volume 1 p49), relevant environmental topics for displaced uses, as it states that the Environmental Impact Assessment scope will only include demolition of displaced uses, with the exception of the Immigration Removal Centres, but will be considered as part of the wider scheme and within the cumulative effects assessment.

Table 4.4 (Generic descriptions of significance ratings, Volume 1, p66) makes no reference to impacts on human health, only changes to environmental or socio-economic conditions.

Biodiversity

From the report, it is clear that rivers and flood storage are not going to be assessed during the operational phase for their effects on air quality and health of river systems. What is worthy of note is that air quality could have an impact on the ecosystems surrounding rivers during the operational phase as a result of increased pollution. In addition, a reduction in the health of river systems can also have a knock on effect on

people's access to open spaces and mental wellbeing and could probably, lead to health issues such as dangerous algal blooms.

Paragraph 6.6.18 discusses baseline conditions, stating that desk studies and 2017 surveys suggest no schedule 8 plants are at risk from the development. However, Brown Galingale is listed as a schedule 8 species and is present in the seedbank at Shortwood Common, close enough to put habitats at risk of damage through pollution. This could damage ongoing efforts to get the plant to germinate successfully in the future.

Ecological impact assessment on birds of an expanded operational airport needs to be assessed particularly in respect to large birds such as swans. That is, assessing the impact that the airports current and future proposed Bird Team activities on bird populations and natural (nesting) habitats extending to an area that also encompasses Spelthorne.

Waste Water routing and treatment will also need articulating.

Traffic & Transport

Within Heathrow's Consultation 1 Heathrow related traffic was defined as "movements by motorised vehicles into and out of the airport and using the public highway whether carrying passengers or colleagues or for the purposes of airport related freight and servicing". In the EIA Scoping report the term has been restricted further and is inconsistently defined between topic chapters. In Section 5.6.1 (Ambient Air Quality) pp115-116, airport-related traffic is defined as trips starting at or ending at the airport, whilst any trips not starting/ending at the airport are included as non-airport related road traffic. In Table 5.8 [Likely Significant AQ & Odour Effects Volume 1, pp127-130] increased emissions from vehicles associated with the DCO scheme are termed as 'Vehicular traffic associated with the Airport' (including airport staff and passengers and freight vehicles). The latter is still limited only to vehicle trips on the public highway. The EIA Scoping needs to be able to distinguish all new trip flows as a consequence of the DCO scheme including airport staff, passengers, ancillary workers and business trips associated with airport supporting facilities, passenger driven airport related development (i.e. offices, hotels, retail, commerce, supply chain uses) and cargo driven airport related development. Where the DCO Scheme is only providing for a proportion of the anticipated need for ASF, passenger driven and ARD facilities, with the remainder to be provided by market forces outside the DCO application, this should be specified, with estimated traffic flows included in traffic and AQ modelling to reflect the true impacts of the completed scheme.

Table 4.6 also only includes vehicle emissions from vehicles on the public highway. Further, Table 5.8 (Likely significant AQ and odour effects, Volume 1, p127) limits construction vehicle impacts to those vehicles using the public highway or temporary construction haul roads – Heathrow controlled roads are not included. And the scope of the traffic and transport assessment in Chapter 17 is also limited to just vehicles on the public highway, e.g. paragraph 17.1.3.

In Table 17.3 (Likely Significant traffic and transport effects, p 597), the assessment of operational phase impacts are restricted to movement of people and freight "to and from the Airport" - the scope of the assessment should include all movements to and

from the DCO scheme, and sensitivity testing of the additional movements to and from all the airport related development necessary to support a successful and sustainable expanded airport. Within Table 17.3 people is defined as passengers and colleagues - the scope of colleagues is vague and should incorporate all maintenance workers, cargo industry workers and those in service industries, offices, hotels and supply chain companies.

The Perimeter Roads and tunnels are owned by Heathrow Airport Ltd and are not public highways. The scope must include traffic on all roads, as vehicle movements on the airport controlled landside roads could have significant highways, air quality and noise impacts. Vehicles do not stop emitting pollutants and noise upon leaving the public highway and joining the airport controlled roads. Yet the scope of Chapter 17 (Traffic & transport impacts) is specifically limited to all modes of surface transport using the public highways and public transport networks (para 17.1.3, Volume 1, p584).

The Perimeter Roads currently carry a high proportion of traffic circulating around the airport between terminals, car parks and other ancillary airport facilities. These movements must be included in both the baseline and future assessment of vehicle movements. With a scope covering only public highways and public transport networks it is likely that the assessment is not capturing all types of vehicle movements around the site, such as staff shuttle buses, car park shuttles (staff and passenger), car hire and hotel shuttles, and terminal transfers – some of these could have also been scoped out as not being public transport networks. Many of these movements may not currently leave the perimeter roads, but with the severance of the north and western perimeter roads are likely to be required to with the DCO scheme.

Chapter 17 on traffic and transport is to cover all modes of surface transport including private hire vehicles and taxis. On-street parking of PHVs is already a problem in our communities of Stanwell Moor and Stanwell. With proposed consolidation of parking to south west of the airport and improved access into the terminals, the problem could be further exacerbated. There is no mention in the EIA Scoping Report about parking issues in Stanwell, or any other communities around the airport. This issue needs to be accounted for in the traffic and transport assessment and possible mitigation options developed for how the problem will be dealt with in a holistic manner so as not to transfer the problem around the airport as has occurred in the past.

Noise

The DCO process and the airspace design process will not happen at the same time. Therefore following Civil Aviation Authority (CAA) guidance and best practice indicative airspace designs must be used in the assessment of aircraft noise for the DCO process, with *flight path designs being defined at a later stage after detailed airspace design work has taken place*

Question 2. *The relevant components of the DCO Project and the resultant likely significant effects*

General

The EIA assessment zone is too tight and needs to encompass the entire area of Spelthorne, particularly in assessing the cumulative impact on existing communities.

Biodiversity

Paragraph 6.8.1 (Volume 1. p190) states that ecological features of local or negligible importance are to be scoped out of the biodiversity assessment. However, the criteria and judgement of deciding what is 'local and negligible' is not apparent from Table 6.11.

Economics & Employment

The economics and employment of Construction is warranted which is a major component for assessing expansion and ensuring the viability of operation. This is of critical importance to Spelthorne: the construction site(s) impact on SSSI Staines Moor needs assessing.

Traffic & Transport

Table 3.2 Environmental topics to Terminals & Aprons (Volume 1, p40) includes traffic and transport impacts in the construction phase but not in the operational phase. The justification for this is not clear as terminals will have vehicular access once operational for private vehicles, taxis and buses/ coaches as well as servicing and supply chain goods vehicles.

Table 17.3, Likely Significant Traffic & Transport Effects, does not sufficiently reflect the scale of the required cut & fill operation. Until a new rail head at Colnbrook, and its use to transport waste materials to off-site disposal, is assured, the assessment needs to scope in transportation of all materials by road. Early estimates of the mass balance of the cut and fill operations have been in the order of four million cubic metres of material requiring movement.

Air Quality

Air quality impacts below legal limits have been segregated from the main air quality assessment in Chapter 5 and included in the Health Assessment, Chapter 12. This should not degrade the significance of these impacts on the health of local communities.

Figure 5.4 (Volume 2, p36) shows the locations of existing continuous air quality monitoring stations. However this is presented at a different scale to Figure 5.1 (Volume 2, p33) showing the 12x11km air quality core assessment area, and so the whole of the core assessment area is not covered in Figure 5.4. This misleading gives the impression that the existing monitoring stations provide a good coverage across the core assessment area. There are ten monitoring stations to the northern side of the existing airport, yet only one to the south west of the airport (Oaks Road) and one

to the south east (Hatton Cross). Paragraph 5.5.7 (Volume 1, p115) states that no further monitoring stations are considered to be required to provide baseline air quality monitoring data.

This reflects the assessment needs of existing operations and the airport's current surface access prioritised from the M4/A4 to the north of the airport. This position is revised at paragraph 5.9.5 (Volume 1, p131) where it is stated that a new monitoring station is being considered by HAL along the A4 to the north to provide data to clarify the actual baseline versus the PCM modelling. This would be an 11th monitoring station to the north and east of the airport. Both monitoring stations on the southern side are in close proximity to the current airport boundary - Oaks Road being 230m south of the current airport boundary, but within the DCO scheme boundary; and Hatton Cross approximately 130m south east of the current airport boundary, respectively. So there are no existing continuous monitoring stations providing coverage in the southern third of the core assessment area (including the communities of Staines, Ashford, Egham, Bedfont, Feltham and Hanworth), and no roadside continuous monitoring stations to the south of the airport at all.

Given the southerly shift of surface access to the airport and the bias in new airport related development to the south of the airport, it is reasonable to anticipate that the southern half of the core assessment area will see the largest negative impacts on air quality with the DCO scheme. Therefore it is contended that further baseline monitoring data should be collected from this area, particularly to inform the baseline air quality health assessment.

Diffusion tube monitoring data collected by Local Authorities will not be used to assess the baseline air quality picture, only in model verification. In the absence of existing continuous monitoring stations to the south of the airport diffusion tube data is critical to the understanding of baseline air quality levels.

In Table 5.8 (Likely Significant AQ & Odour Effects, Volume 1, p127) the construction phase makes no mention of demolition of displaced uses. This will include large building volumes, with demolition activities at height and is likely to include on-site crushing and screening, so has the potential to have a large dust emission magnitude that could be significant for sensitive receptors. And yet this is scoped in within paragraph 5.9.13 (Volume 1. p133).

There is also no inclusion/ consideration of increased emissions from existing traffic flows due to delays and diversions caused by construction activities. This is absent from Table 4.6 and the text of Chapter 5, the air quality topic chapter. This could see increased queue times at key junctions, have implications for junction capacity and increased congestion, leading to higher emissions from existing flows. Due to the scale of the construction, the delays and disruption to the highway network would be ongoing for an extended length of time and therefore could be significant and not a brief, fleeting temporary effect. The traffic and transport chapter of the scoping report (chapter 17) sets out that this assessment will assess highway network delay (as referenced at paragraphs 17.1.16 and 17.9.15 and Table 17.3). With the delay impacts being modelled for traffic impacts, then the dataset will be available for inclusion in the air quality modelling, and therefore it should be scoped in for both the construction and operational phases of the air quality assessment.

The operational phase of Table 5.8 refers to impacts from aircraft movements on the new runways and taxiways, but does not refer to impacts from changes to existing runways and taxiways (which is also not referred to in Table 5.9 of scoped out impacts). The DCO scheme is to include a proposal for an immediate increase in flights of up to 25,000 ATMs per year off the two existing runways. In addition, though not explicitly detailed it would seem probable that the infrastructure to implement the end of the Cranford Agreement would be enacted in advance of the third runway. This change would impact on how the runway alternation is done under easterlies, with an increase in take offs from the northern runway, which a commensurate increase in landings on the southern runway. This could bring both positive and negative AQ benefits for different geographical areas. This should be considered and likely significance discussed.

The operational phase of Table 5.8 does not include any account of emissions from on-site generation of heat and electricity to power the airport. The airport has recently made improvements to reduce these emissions but they still account for about 4% of ground-based NOx emissions from existing operations at the airport. Expansion of the airport will require additional energy plant (as per Table 3.7). The EIA scoping report has not included this within the air quality chapter as neither a likely significant impact nor an impact to be scoped out.

Land based activities in the operational phase (Table 5.8) should also include emissions from airside vehicle movements.

The operational phase of Table 5.8 includes vehicular traffic associated with the Airport. However the effect is restricted to emissions from vehicles on public highways – this should include vehicle emissions from all landside roads at the airport (and within the AQ core assessment area). The existing Western, Northern and Southern Perimeter Roads together with roads into the Central Terminal Area and other terminal accesses are not public highways. Whilst some of these road links will be lost under the DCO scheme some will remain and other may be provided.

The existing EIA regulations is viewed as a minimum, hence, the assessments need to go beyond A3044 new alignment or Stanwell Moor junction to encompass local roads which are currently under-represented (which in all probability will become rat runs across Spelthorne). Equally, areas effected by road options need to be fully encompassed.

Noise

Methodology for identifying significant effects

In paragraph 16.10.77 reference is made to Table 16.7 which defines values for the Significant Observed Adverse Effect Level (SOAEL) for different noise sources. It also defines values for the Lowest Observed Adverse Effect Level (LOAEL). However, no reference is made to UAEL (Unacceptable Adverse Effect Level), which is also defined in government policy and is an important concept in that noise effects on people at this level are to be prevented from occurring.

The UAEL is actually defined in Table 16.6 of the Scoping Report. However, the table does not attempt to distinguish the actions that should be taken to prevent this level of effect from occurring from those that should be taken to avoid the significant adverse effects from occurring.

In paragraph 16.10.81 it is stated that significant effects on health and quality of life are identified in line with government noise policy. However, no attempt is made to define the UAEL nor identify actions required to prevent this from occurring.

Reference is made in paragraph 16.10.91 to an evidence review that has been undertaken to determine appropriate values for LOAEL and SOAEL for the various noise sources to be assessed. Notwithstanding the lack of reference to UAEL, which should be included, it is not clear why the publication of the review has to be delayed to accompany the PEIR (Preliminary Environmental Information Report).

Setting appropriate values for these measures of impact is a cornerstone of the noise assessment and matter of high importance to the majority of stakeholders. The sooner justification for the proposed values is provided and debated, the better.

Residential receptors: Direct and indirect effects
Paragraph 16.10.99 and Table 16.7 sets out LOAEL and SOAEL values proposed to be used for this assessment. Note:

- Values are not provided for UAEL;
- Aircraft noise and aircraft ground noise are lumped together in the same category and assigned the same values for LOAEL and SOAEL. This is an unusual approach given the starkly different character of air noise (a series of high level, transient noise events) compared to ground noise (underlying steady state noise with a small degree of fluctuation). It differs from the approach used to assess noise at other UK airports (e.g. London City, Luton, and Stansted).
- For aircraft noise, L_{Amax} is identified as metric with an associated value of LOAEL and SOAEL, yet no values are proposed (unlike for railway noise).

As noted above, the values finally used in the assessment are of high importance and likely to be of interest among all affected LPAs and other stakeholders. Early dissemination of the rationale behind the numbers proposed is important so that debate is promoted and agreement on suitable values reached as soon as possible.

Spelthorne has a number of concerns about Figure 16.3:

- Does not refer to UAEL;
- Under primary factors refers only to a comparison of the primary noise metrics against the LOAEL. Comparison against the SOAEL (and UAEL) is not explicitly stated;
- Under additional factors, it is proposed to assess the change in overall ambient noise level (as opposed to change in noise exposure from a particular source). How will the results of this comparison be assessed or rated?

Within paragraph 16.10.106, primary factors #1, #2 and #3 are to be considered in combination, the seeming implication is that they are considered in that order. There is an argument for promoting 'change in noise exposure' to #1 (from #2), as this assessment is primarily about changes to the noise climate around Heathrow arising from a new third runway.

With regard to identifying significant effects at noise levels between LOAEL and SOAEL, it is not clear exactly what is meant under point c)[1].

It is unclear in paragraph 16.10.116 how the change in ambient noise levels, whether quantitative or qualitative, will be assessed. What standards, guidance or evaluation criteria are proposed to be used? Information must be provided on this.

At paragraph 16.10.113, similarly for 'additional noise metrics', it is unclear how the change in ambient noise levels, whether quantitative or qualitative, will be assessed. The intentions appear laudable, but without clear assessment standards against which to rate any changes, it is not clear how these will materially inform the Environmental Statement.

[1] c) The relative scale of population and magnitude of noise change considered 'small' or 'large' are at their largest when the calculated noise exposure is just above the relevant LOAEL and are at their smallest when the exposure approaches the relevant SOAEL.

Question 3*. Those effects not likely to be significant that do not need to be considered further*

Table 3.7 (Relevant environmental topics to airport supporting facilities, Volume 1, p48) does not distinguish between whether it relates to the construction or operational phases of the DCO scheme or both combined. Air quality has only been considered relevant to the topic of new cargo floorspace, noise and vibration as relevant to energy generation plant, and traffic & transport as relevant to car parking. No justification has been provided as to why air quality, noise & vibration and traffic & transport are not all relevant topics to new cargo floorspace; MRO floorspace; car parking; energy generation plant; and waste & recycling facilities.

Furthermore for the construction phase air quality, noise & vibration, and traffic & transport is seen by Spelthorne to be relevant to construction of all the airport supporting facilities. Economics & employment is inexplicably absent from MRO floorspace, and could be considered relevant in other facilities too.

Table 3.7 (Relevant environmental topics to airport supporting facilities) has not included air quality against new energy generation plant required in airport supporting facilities. No detail has been provided about what type of energy plant would be provided and whether this will generate on-site emissions or be from renewable sources – no justification has been provided for why air quality has been scoped out.

Paragraph 12.9.20 (Volume 1, p374) outlines that flooding will be scoped out of the health assessment as consent will not be granted until the Regulator (the Environment Agency) is satisfied that the design adequately manages the risk of flooding. This section of the EIA should recognise the health risks that can be associated with the fear of flooding. The Lower Thames catchment was subject to serious flooding in 2014. Stress and anxiety is high in the local population about when such flooding could reoccur, and public perception about flooding risks may not match those concluded within a flood risk assessment.

Question 4*. The approach to setting the study areas for each topic*

Air Quality

Paragraph 5.9.32 (Volume 1, p138) outlines the role of the Air Quality Expert Review Group - to provide a technical check and challenge of their approach to the AQ assessment. The purpose of the group is to provide an independent and expert perspective. Spelthorne welcomes the use of independent industry experts by HAL, but whilst 5.9.32 sets out how many meetings have been held and the topics discussed at them, it still remains unknown what the outputs of the AQERG were in relation to those topics and whether HAL is following their recommendations. There is currently no commitment to share the outputs of the AQERG or demonstrate how the AQ assessment has been tailored by their review. Without transparency there is no assurance value to the AQERG.

The traffic and transport study area is much wider than the 12 x 11km air quality core assessment area. Paragraph 17.4.5 (Volume 1, p592) sets out that the geographical extents to the two traffic modelled areas shown in Figure 17.1 were set on the basis of including highways links on which a third runway scenario without additional demand management leads to a 5% increase in vehicular trips. The 5% threshold was chosen as guidance from the Institution of Highways and Transportation assumes that significant impacts to highway capacity may occur if peak hour traffic flow increase by more than 5% where the network is sensitive. This indicates that there will be locations within the highway study area which will experience a greater than 5% change in traffic flow, and so a wider area than the air quality core assessment area could have significant traffic and transport effects. Impacts such as increased movements causing journey delay, congestion, and affecting highway capacity is likely in turn result in significant air quality impacts.

Therefore it is our view that the spatial extent of the air quality core assessment area is insufficient. The study area is so restricted that there are a number of significant omissions:

- It does not encompass all of the Additional Development areas illustrated in Figure 3.1;
- It only extends about 1500m west of the proposed third runway;
- It excludes Iver in the north where a new air quality management area (AQMA) is being consulted on by South Bucks district Council and there are concerns about additional construction traffic and cumulative impacts with other committed schemes;
- It does not encompass all of the Brands Hill AQMA to the west and a proposed new AQMA in Langley by Slough Borough Council;
- It does not encompass foreseeable diversionary alternative road routes from the south and west avoiding the M25 at peak time via the M3 and through Spelthorne's AQMA and particularly the air quality hotspot at Sunbury Cross, M3 Junction 1.

Paragraphs 5.4.15 and 5.4.16 (Volume 1, p113) set out the study area criteria for construction dust. For human receptors this is given as within 350m of any boundary

relevant to the DCO scheme and 50m of route(s) used by construction vehicles on the public highway or haul routes. This needs to explicitly include all Heathrow controlled roads as well, not just public highway. The same should apply with respect to ecological receptors (para 5.4.16, bullet 2).

Noise

Contrary to what was articulated in the report at paragraph 3.3.37 and Table 4.5, the location of a number of components, such as the energy from waste plant is absolutely dependent on the precise suitability of the location.

Construction noise

We agree with the principle at paragraph 16.4.4 that study areas must, as a minimum, encompass all areas within which construction noise is likely be above the LOAEL.

The proposed study area, discussed at paragraph 16.4.2, extends to 300m from any construction activity; this is likely to be on the low side in instances where, for example, substantial night time works or piling works are envisaged and some areas outside this may be subject to adverse effect. This will need to be checked and verified against the overall objective of including any location likely to experience an adverse effect from noise.

With regard to vibration, 100m has been identified as the greatest distance over which vibration from construction activities will need to be assessed. Although this statement seems redundant given that construction vibration is scoped out of the study later in the document (Section 16.9); this needs to be clarified.

Operational noise

Paragraph 16.4.6 discusses the study area for operational noise. Again, we agree with the principle that study areas should, as a minimum, encompass all areas within which operational noise is likely be above the LOAEL. In the case of airborne aircraft noise, however, further information must be provided on how the noise study will respond to the requirements in Air Navigation Guidance 2017 that noise should be considered at levels of exposure below LOAEL and up to an altitude of 7,000 ft.

For airborne aircraft noise (paragraph 16.4.5) a study area of 40 nm x 20 nm (east west by north south) would appear to be suitable. In context the draft NAP (2019 – 2023) includes $L_{Aeq,16h}$ contours for Heathrow Expansion Scoping Report 2016 that are plotted on maps covering an area of 23 nm x 17 nm (east west by north south). At first glance the proposed study area of 40 nm x 20 nm (east west by north south) would appear sufficient, although the following factors must be taken into account in determining the full extent of the airborne aircraft noise study area:

- Noise contours will need to be plotted down to at least the LOAEL, which for the $L_{Aeq,16h}$ index is 51 dB. This will cover a substantially greater area than the 54 dB contour presented in the draft NAP;
- Contours of supplementary noise metrics, including N65 daytime, may cover an even greater area depending on the lower limit of values selected for the study;
- Results of preliminary noise modelling of the proposed north west runway expansion indicates a greater degree of change in the north south orientation than east west;

- According to the ANG 2017, noise should be considered at levels of exposure below LOAEL.

For aircraft ground and airfield activity noise, extending the study area to 1 km from any ground based operations appears to be a reasonable figure.

For changes in road or rail traffic noise, the proposed 600 m study area is consistent with advice in DMRB in relation to routes affected by new or altered highways.

For operational vibration, the indicated 85 m from any activity appears reasonable. The scoping report must, however, confirm that this is an adequate extent to cover ground borne noise which can often lead to perceptible effects in certain environments at energy levels below which the associated vibration is perceptible. Put another way, ground borne noise effects may be adverse over a greater distance from the source than feelable vibration, and the extent of the study area needs to reflect this.

The indicated study area applies to train vibration (and ground borne noise) only, as vibration from road traffic is scoped out of the study later in the document (Section 16.9).

The preceding paragraphs to 16.10.133 describe the situation whereby noise levels due to aircraft departing and arriving the airport, typically > 51 dB $L_{Aeq,16h}$, are less affected by the final Airspace Design than those further out. In effect, the airport has a 'funnelling effect' on aircraft routes with aircraft being more positionally constrained the closer they are to the airport. Airspace Design changes after submission of the DCO are more likely to affect aircraft locations, and therefore noise levels, at greater distances.

At these greater distances, aircraft noise levels in the community will be lower, with the primary assessment metrics ($L_{Aeq,16h}$ and $L_{Aeq,8h}$) likely to be below the LOAEL value. At greater distances and lower noise levels, aircraft noise modelling tends to become less precise. ERCD have, for example, previously expressed concern about the accuracy of ANCON 2.3 when predicting which geographical areas are exposed to noise levels below 50 dB $L_{Aeq,16h}$.

T uncertainty should be reflected in the assessment of likely significant effects beyond the LOAEL boundary which we believe to be 'the area of common exposure'.

We also refer to our previous comments under 16.4.5 regarding the extent of the noise study area.

The uncertainty (paragraph 16.10.134) needs to be reflected in the WebTAG monetisation analysis, which we understand requires the number of properties exposed to daytime noise levels above 45 dB $L_{Aeq,16h}$ to be determined.

***Question** 5. The data that has been gathered (and will be gathered)*

General
Pursuant to Regulation 15(9) of the EIA Regulations 2017, notwithstanding the details listed above, the Council reserves the right to request additional information in connection with any Environmental Statement submitted, as appropriate.

Biodiversity
The Climate Change Act 2008 and Environmental Protection Act 1990 should be included in the list of legislations within Table 6.1 (Policy and legislation relevant to biodiversity assessment, Volume 1 pp149-152) relevant to biodiversity.

Air Quality
Para 5.9.6 [Volume 1, p131] states “Monitoring of baseline PM, dust deposition and odour levels will be undertaken in advance of commencement of the construction programme. Odour complaints data will also be collated and reviewed”. No details are provided here or referred to about where this baseline monitoring would be carried out (how many locations and where on-site and off-site of these locations), when, over what period nor the methodology. Subsequent paragraphs are somewhat contradictory on this issue. At paragraph 5.9.17 it refers to the Institute of Air Quality Management (IAQM) best practice guidance and outlines that assessment tools include monitoring of ambient air and via complaints analysis. In paragraphs 5.6.20 and 5.6.21 it is indicated that there will be baseline odour surveys – this suggests something very different, perhaps sniff tests, field olfactometry, compound analysis or community surveys for example, to just reviewing past complaints, which is ultimately proposed in paragraphs 5.9.30 & 5.9.31.

Table 4.3.1 [Guidance and Best Practice Documents, Volume 3, p 434-443] refers to the IAQM, 2014, Guidance on the Assessment of Odour for Planning. This guidance states that an odour assessment tool that takes account of FIDOL [frequency, intensity, duration, offensiveness and location] factors should be used, that the choice of tool should be justified as to why it/ they are suitable for the assessment and that the methodology should also justify that the approach used is of a depth and rigour consistent with the likely risk of adverse effects. More justification is required about the appropriateness of the odour assessment methodology.

Similarly there is no methodology set out for the dust deposition baseline monitoring, nor assessment strategy. Best practice guidance is often for such surveys to ideally be over a full year, and certainly spanning both some of the winter and summer months. Surveys of short duration are unlikely to provide sufficiently representative data. No indication has been provided as to what technique(s) would be used for both the baseline PM and dust deposition monitoring. There are a number of methods for both and all have advantages and disadvantages, and the key differences between them have implications for recommending compliance values, designing dust management and monitoring schemes and evaluating data. It is not clear whether PM baseline monitoring would just be via the existing network of AQ continuous monitoring

stations or additional sites, via optical analysers for example. No details have been provided about how the baseline dust deposition data would be assessed – would this be via custom and yardstick measures for deposited dust (e.g. 200 mg/m^2/day averaged over a 4 week period) or would the methodology seek best practice through a bespoke site-specific value, which would definitely require at least 12 months of local baseline monitoring data to be available.

Best practice guidance from the IAQM, 2014, Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites, is not referred to in Chapter 5 or Table 4.3.1 (Guidance and Best Practice Documents, Volume 3 pp 434-443). As per out comments in relation to the traffic & transport and air quality assessment criteria under Question 6, the IAQM (2017) Land-Use Planning & Development Control: Planning for Air Quality best practice guidance should be followed, and therefore should also be listed in Volume 3's Table 4.3.1.

Paragraph 5.6.20 states that "current dust levels in the areas potentially affected by the DCO Project are expected to be well below annoyance levels due to the nature of land uses in the area and lack of likely emission sources". However in northern Spelthorne the landscape is characterised by aggregate processing recycling facilities, restoration of historic landfill sites and waste management facilities.

Figure 17.3 Existing Road Infrastructure does not extend to cover the whole of the air quality core assessment area yet alone the highway study area. Nor does it reflect the role and nature of more minor roads not depicted in the figure. Paragraph 17.6.3 (Volume 1, p595) states that "many of the roads around Heathrow are congested" including "key routes such as the M25, M4, A40, A30 as well as many of the minor roads surrounding the airport".

Land Quality

Para 14.6.42 (Volume 1, p431) details that Slough BC have identified an area used for unauthorised storage of scrap vehicles which has the potential to be contaminated. Within its responses to HSPG work requests, Spelthorne identified two sites within the DCO Project land used for motor salvage operations at Greenacre Farm and Crane Road by the same operator with oil contamination noted on planning appeal documentation for the former site and with a prosecution at the second site.

Spelthorne have provided information on historic landfills to HAL via two HSPG work requests, yet Figure 14.9 Landfill sites and Infilled ponds is still not showing correct locations/ boundaries for landfills at Stanwell Moor, Willow Farm, St David's (Welsh Girls) School Tip, Land South of Horton Road and Yeoveney Landfill at M25 Junction 13.

The group of Figures 14.10 to 14.17 on potential contamination sources only cover the original zones for which information was requested from HSPG, and not all the baseline information that has been provided. The Envirocheck data does not encompass all historic land uses with land contamination potential for sites within Spelthorne.

Noise

In paragraph 16.2.2, Table 16.1 refers to the Civil Aviation Act 1982. Further Civil Aviation Acts came into force in 2006 and 2012 which widened and modernised the powers available to the government to control noise at airports and also permitted airport operators to impose differential charges based on aircraft noise emission.

Some relevant UK legislation and planning guidance is not referred to in Table 16.1:

- *Airports Act 1986:* giving powers to the Secretary of State to regulate runway utilisation, allocate airport capacity and limit the number of occasions on which aircraft may land or take off.
- *Aeroplane Noise Regulations 1999:* dealing with noise certification for aircraft, referencing the noise limits issued by ICAO and restricting operations to properly certified aircraft.
- *Professional Practice Guidance on Planning and Noise (Pro PG):* published jointly by the ANC, IOA and CIEH[2], this document is guidance for acoustic practitioners, planners and developers with the aim of protecting home dwellers from excessive levels of noise through good design. This has relevance for new development in areas around Heathrow airport that are affected by aircraft noise.

With respect to the approach to gathering baseline data, set out from paragraph 16.6.26, Round 2 of the baseline data gathering exercise must include and identify any Round 1 data that is more 2 years old. Where such data sets are crucial to the definition of the baseline conditions, proposals for updating the data to ensure they reflect current baseline conditions must be made.

Round 1 baseline data referred to in Table 16.3 that is more than 2 years old include:

- 3rd Runway Noise Assessment (Amec and Environment & Infrastructure Ltd.): June 2014 – 4 years old;
- Strategic Mapping (Defra): 2012 – 6 years old;
- EIA (Crossrail/RPS): July 2003 to October 2004 – 14 years old.

It is noted that baseline data resulting from Stages 1 and 2 of the baseline noise gathering exercise will be presented in the PEIR which will be the subject of consultation (identified as Consultation 2). This will give LPAs, including Spelthorne, the opportunity to consider whether further or more detailed baseline noise data, or a modified data collection methodology is required in order to properly characterise the existing noise environment.

A further check of the Stage 1 and 2 baseline noise data will also be performed by the Noise Expert Review Group (NERG) (Paragraph 16.6.26).

These are positive proposals which should ensure that the Stage 3 noise data gathering exercise results in a comprehensive dataset that fulfils the requirements of all key stakeholders.

[2] Association of Noise Consultants (ANC), Institute of Acoustics (IOA) and Chartered Institute of Environmental health (CIEH)

Due to the fact that airspace designs will not be finalised in time for inclusion within the EIA, the assessment will rely on indicative airspace designs comprising indicative flight paths as set out at paragraph 16.7.6. It needs to be confirmed that these indicative flight paths will include proper consideration of Performance Based Navigation (PBN) flight paths.

Adoption of PBN enhances navigational accuracy and allows aircraft, particularly on departure, to fly on tracks that incorporate a much smaller degree of dispersion. This results in a greater degree of control over which areas are overflown and which are avoided and therefore has the potential to reduce the number of people affected by aircraft noise. PBN also offers increased options for the establishment of noise respite/relief routes. On the other hand, concentrating flights over specific areas is likely to lead to a greater noise impact in those areas and may influence the extent and nature of the mitigation or compensation to be provided.

***Question** 6. The assessment methods that will be used to determine likely significant effects*

Biodiversity
Paragraph 6.5.9 sets out that twenty-four method statements have been produced for existing (2017) field surveys to collect baseline data, and that these have all been formally agreed with Natural England. Spelthorne welcomes that wider technical discussions are been undertaken with local and regional wildlife and nature groups. .

Air Quality
Paragraph 5.4.13 states that nitrogen dioxide concentrations will be considered at key PCM assessment locations within the air quality core assessment area (as per Figure 5.2), and further that additional PCM road links between the airport and Central London where the compliance status of the Greater London Agglomeration could be impacted. Assessment should not be blinkered toward central London as there are road links to the south and west of the airport, including in Spelthorne, that are also within the Greater London Agglomeration, where changes in airport-related traffic may affect the compliance status.

The PCM model does not include road links on motorways, including the M25 and the M4, nor the perimeter roads around the airport that are airport-controlled. Therefore compliance with air quality objectives should not be solely focuses on compliance on PCM links. The air quality assessment in the environmental statement must model all main roads across the wider area (all around the airport) and local roads in the immediate vicinity of the scheme. The PCM model baseline projections significantly underestimates nitrogen dioxide levels in comparison to local monitoring. The assessment must therefore take account of air quality monitoring data from the local authority networks across the Heathrow area, and not just the HAL continuous monitoring stations.

It is proposed to use the DMRB screening criteria as the assessment criteria for identifying road links that will be considered to be potentially affected by the DCO Project (paragraph 5.4.9). This Highways England Guidance was intended for use on Strategic Road Network schemes and not for land development in congested urban areas. Spelthorne consider that more appropriate guidance is that contained within the IAQM (2017) Land-Use Planning & Development Control: Planning for Air Quality, where criteria reflect urban settings for which smaller changes in local air quality have implications for achieving compliance with EU limit values. The IAQM guidance sets traffic flow thresholds for both land within (or adjacent to) an AQMA and elsewhere, whilst also recognising that the less stringent criteria may be appropriate in whole Borough AQMAs taking into account local monitoring results. Given the context of the DCO scheme in relation to AQMAs around Heathrow (as shown in Figure 5.3) and the additional areas being consulted on by Slough Borough Council and South Bucks District Council, the IAQM guidance is more applicable.

Paragraph 5.6.6 should reference AQMA along road links, throughout the detailed modelling area and the fully modelled areas of the traffic & transport assessment

(Figure 17.1) which may be affected by additional traffic flows as a consequence of the DCO scheme.

The traffic and transport assessment (paragraph 17.4.8) proposes to consider only areas with changes in flows of 30% or 10% HGV flows in sensitive areas. There could be significant air quality impacts within existing or proposed AQMAs below the thresholds for traffic assessment. As outlined above, the IAQM guidance thresholds, setting numerical criterion on LDV and HDV flows are more appropriate.

Appendix 5.1 (Volume 3, pp 444-458) sets out the methodology for dispersion modelling. It is customary for air quality dispersion modelling of airport schemes to include the whole aircraft landing and take-off cycle, including operations on the ground and in the air up to 3,000ft (~1,000 metres) above ground level. It is commonly accepted that in reality emissions above about 1,000 ft make a negligible contribution to local air quality levels on the ground. In consultation 1, The Approach to Air Quality document referred to research that concluded negligible effects on ground level air quality once aircraft are above 350-650ft (100-200m) on departure and 160-350ft (50-100) on arrival. However the past inventory approach has been to tabulate both total emissions to 1,000m and also just ground level emissions. Spelthorne is pleased that consistency of approach is to be maintained so that future modelling can be compared to past inventories. The dispersion modelling will in any event ensure that emissions at different heights are properly weighted in their contribution to ground level concentrations. Once the air quality modelling is undertaken it will be helpful to demonstrate the limited effect of airborne aircraft emissions on local pollutant concentrations by mapping just airport-related contribution to annual mean concentrations of pollutants, with a plot showing just the airborne aircraft emissions contribution. This approach has been taken in the past in the 2013 Air Quality Assessment for example.

Appendix 5.1 though appears to only consider the operational phase sources. Detailed modelling should also be undertaken for the construction phase, given the length of time and expected numbers of additional construction movements (Both HGVs and workers), construction plant and Non-road mobile machinery (NRMM).

Health

Paragraph 12.9.7 (Volume 1, p383) Heath – Assessment Years should mirror the assessment years of the traffic and transport and air quality assessments. Mirroring of air quality, noise and transport topics is referred to in paragraph 12.9.9, but the assessment years set out at 12.9.7 does not reflect those topics. The Health Assessment years should include release of early ATMs and the end of the Cranford Agreement.

Table 12.5 (Health Effects subject to quantitative analysis, pp376 – 377) includes changes to mortality and morbidity from changes to emissions to air from aircraft and road traffic vehicles. This is welcomed as changes to exposure, even below legal limits, will bring health impacts to local communities. However the data should be presented both spatially (as detailed dispersion modelling is available from the air quality assessment) and tabulated by geographical area at ward level (to match baseline health morbidity and mortality data). Note: baseline health data is likely to be

available on a ward basis, the areas for which may not match the community boundaries depicted in Figure 9.1 (Volume 3, p49).

In paragraph 12.9.1 (Volume 1, p380) on significance of health effects, location is not considered – i.e. is one community going to be particularly affected, and also significance is being judged for each singular potential health effect. Where receptors are impacted by changes in sound exposure, emissions to air and road traffic, the combination of these health effects could change the significance of impacts. Cumulative effects must be considered in the Health Assessment.

Table 12.7 (Example guide questions framing the professional judgement on health significance, Volume 1, p381) sets out the example criteria that will be taken into account by assessors in making a professional judgement on health significance. One of the criteria is whether there are regulatory or statutory limit values set for the relevant context. For air quality and nitrogen dioxide weighting should also be applied as to how close predicted concentrations are to those levels. For particulate matter there is no threshold level below which there are no health effects. Consequently under the local air quality management regime there is emphasis on minimising exposure, even where levels are well below the limit values, and this must be borne into judgements.

Land Quality

Appendix 14.1 (Land quality Approach to Human Health and Controlled Waters Risk Assessment, Volume 3, pp1235-1268) was consulted on with HSPG members via a work request prior to the EIA Scoping Report consultation. The document has been amended to reflect the comments of the Environment Agency and Local Authority Land Quality Officers.

Noise

Construction assessment methodology

With reference to paragraph 16.10.19 and construction noise levels being determined at noise sensitive receptors for a worst case typical month ($L_{Aeq,T}$, where T = 1 month), Spelthorne has two comments:

- The same value of $L_{Aeq,T}$ at two receptors may mask quite different noise experiences if one is subject to relatively steady state noise and the other is exposed to a time varying series of transient or impulsive noise events.
- Assessing the noise effects aggregated over a 1-month period does not necessarily distinguish between receptors exposed to noise for 1 month versus those exposed to the same level of noise for 1 year.

It is recognised that currently there is little or no information available on the timescales and nature of the construction activity to be undertaken, but it is not entirely reasonable to discount the necessity or advisability of assessing construction noise using additional shorter term, metrics such as $L_{Aeq,1h}$ or L_{Amax}. When further information on the construction methodology is available, this issue must be revisited and a more comprehensive approach to assessing noise effects is adopted if necessary to quantify the full range of effects likely to occur and the types of mitigation best suited to dealing with them.

Operational assessment methodology

For operational assessment on aircraft noise, paragraph 16.1.47, Spelthorne concur with the suite of metrics proposed for analysis, together with the categorisation into primary and additional outputs. Clarification is sought on two points:

- Is it proposed to use the L_{max} outputs only to assess potential sleep disturbance during the night time period? Daytime L_{max} values are also instructive when considering the full range of impacts on noise sensitive receptors such as schools.
- Will the 'busy summer day' operating schedules be used to identify the variation in aircraft operations and noise levels throughout the daytime and/or night-time period? While the aggregate 16-hour daytime and 8-hour night-time metrics are recognised as correlating most closely with overall community response, it is also necessary to determine whether there are particular periods during which noise effects might be particularly acute. This is especially important if respite from noise is proposed to be provided in communities for parts of the day and over particular times.

With respect to aircraft ground noise, clarification is needed as to whether this does include engines being run, sometimes at high power, for test purposes and against what standards would this particular source be assessed? The Scoping Report is not clear on this issue.

In paragraph 16.10.51 it is described how ground noise levels for aircraft will be established. Clarification is sought on two points:

- Distinction will need to be made between noise generate by main engines and noise generated by APUs. Not only will these have different noise characteristics but they are sources at different heights above ground level, which affects propagation.
- For new generation aircraft not yet in operation, how will noise levels from main engines at low power (sufficient only to manoeuvre the aircraft around the airfield) be determined as compared to those generated by existing, noisier variants? This is a very important issue with regard to air noise, particularly on departure when engines are operating close to maximum power, but it can also be expected to materially affect ground noise calculations.

Table 16.10 (paragraph 16.10.139) sets out screening criteria for non-residential receptors. Hospitals and hotels are rightly assigned night-time screening criteria, but given the risk of individual flyovers generating L_{Amax} values high enough to interfere with sleep, there should also be a screening standard set for this metric.

The reference numbers (31, 34) set for hospitals and hotels are confusing and appear to be errors. Similarly for schools, colleges and libraries (34).

The commentary in paragraph 16.10.141 and following paragraphs (to 16.10.152) pertains to primary and additional assessment factors for no residential receptors. Comments made in relation to residential receptors (16.10.106 to 16.10.113 above) apply here also.

With regard to vibration impacts for non-residential receptors (direct, indirect and secondary effects) Table 16.13 (paragraph 16.10.162) sets out ground borne noise screening criteria for non-residential receptors. We understand the desire to provide boundaries for categories of use that include specialised 'acoustic' facilities such as concert halls, theatres, auditoria and studios. However, sensitivity is not always related to size or a broad definition of category. Rather, we suggest that an audit of all potential such receptors within the study area is undertaken. Each facility should then be assessed on its own merits.

At paragraph 16.7.8 (Future aircraft type performance) full details of the assumptions made with regard to noise benefits emerging from new generation aircraft must be presented.

A sensitivity analysis of possible noise outcomes that depend on the noise benefit assumptions made for future aircraft types is an important part of the study (paragraph 16.7.9). The study must include variations in the rate of uptake of new generation, low noise aircraft, including a worst case position that current generation, noisier aircraft remain a substantial part of the overall mix for all future study years. It must also allow for variations in the actual noise benefits for future variants of current generation aircraft, noting that actual operating procedures adopted at Heathrow airport may lead to differential variations from the noise certification standards for departures and arrivals.

Likely significant effects requiring assessment

With likely significant effects requiring assessment (Paragraph 16.8.2) will the impacts of noise on health be quantified within the ES Noise chapter or will they be included within Chapter 12 Health? It is unclear if a separate Health Impact Assessment form part of the application?

It should be noted that that if the Environmental Statement is to include an assessment of alternative airspace design options, even if only at draft stage pending subsequent detailed analysis by the CAA, the Air Navigation Guidance 2017 document requires that a WebTAG analysis is undertaken to value and compare the noise impact of these options. This is referenced in Chapter 12 of the EIA Scoping Report.

Assessment years

It is proposed that the 'current' baseline (paragraph 16.10.11) will reflect conditions at the point of the DCO submission. It is proposed that this be 2018, as the majority of baseline data will be collected at this point. However, following and based on the results of Consultation 2 and input to the PEIR, and from the NERG, Stage 3 baseline data may need to be gathered. As this is not expected to occur during 2018, baseline data will reflect conditions over a period extending at least into 2019.

This is not considered to be a material issue, but any modelling of noise sources that generates baseline data will need to reflect appropriate operation conditions for the source(s) in question, particularly if those conditions change over the extended baseline period.

In paragraph 16.10.11, bullet point 4 mentions the release of first phase capacity; the EIA Scoping Report states a desire to increase the number of aircraft operating from the existing two runways than currently permitted by Terminal 5 planning condition A4 (480,000 ATMs per year) by some 25,000 ATMs per year. No information has been provided about how this will increase the noise environment or what the impacts will be on residents. Until information has been made available also with proposals to fully mitigation the noise impacts this must not be permitted.

At paragraph 16.11.10, bullet point 8 provides that the year of the predicted maximum environmental effects occurs will depend on the rate of uptake of new generation, low noise aircraft, replacing older, noisier variants. This rate of uptake will be determined by the aircraft operators and not by HAL and is therefore ultimately outside HAL's direct control. This is an important reason for ensuring that appropriate sensitivity checks based on varying rates of new generation aircraft uptake are carried out.

It is to be anticipated that since one of the controls required by the Airports Commission is the setting of an appropriate noise envelope, that envelope will vary over the assessment period and suitable values will need to be agreed for both the year of predicted maximum impact and the year of maximum operating capacity. The latter will be smaller, unless the two scenarios occur in the same year.

Question 7. *The approach to determining the environmental measures that could be incorporated into the DCO Project to avoid, prevent, reduce or, if necessary, offset significant effects.*

General

Paragraph 12.10.5 Mitigation Proposals – this includes the use of Compulsory Purchase Zones (CPZs) and Wider Property Offer Zones (WPOZs), but the geographical extent of the WPOZ is currently too small. Spelthorne is firmly of the view that the current boundary of the WPOZ does not go anywhere near far enough. Two of our most impacted communities, Stanwell Moor and Stanwell, are currently both excluded from the WPOZ.

Paragraph 5.10.22 (Volume 1, p143) sets out an intention to optimise aircraft taxiways and efficient airfield design, but the current Masterplan Assembly Options being consulted on with local stakeholders include two (out of four) options with no northern terminal capacity, and where planes landing on the new northernmost runway would taxi to the western or central terminal area to discharge passengers at a terminal, then have to taxi back up to alongside the runway to an aircraft stand, back to a terminal again to collect passengers for its next flight and then back again to the runway for take-off.

In Chapter 12 more detail is need about what mitigation measures could be incorporated to avoid, reduce or compensate negative effects on health for air quality, noise, odour, landscape and traffic.

Air Quality

The impacts of air quality emissions from the DCO scheme should be fully quantified through the use of emission

Paragraph 5.10.11 (Volume 1, p141) discusses the potential use of zero/ low emission zones in mitigation of traffic & transport impacts. Use of any such zones and or parking charges (paragraph 5.10.32) should not push dirtier vehicles out from terminals into the community, with the parkways in close proximity to local communities or unauthorised street parking.

Mitigation measures for construction dust should reference guidance by the Greater London Authority (GLA) and IAQM. There should be a commitment to vehicle standards for NRMM, following GLA guidance and Supplementary Planning Guidelines.

Commitments should also be made to best practice environmental performance of HGVs and LDVs during construction, setting a requirement for Euro VI/6 emission standards or better for all road going construction vehicles.

Achieving successful air quality mitigation is dependent on the contents and implementation of surface access proposals. As per our Consultation 1 comments this should include investment in sustainable public transport servicing both Heathrow and

the surrounding communities; a broader expansion of electric vehicle charging infrastructure not just at the airport but into the surrounding areas; and ring-fencing of funds from emission-based access/ car parking revenues to support low emission and sustainable transport projects within the local area.

Traffic & Transport

It is important to point out that existing public transport improvements such as Crossrail, Western Rail Access and the Piccadilly line upgrade are there to deal with existing demand under a two runway airport - not to cater for expansion. These schemes should not be considered as the only mitigation for the DCO scheme for surface access and traffic impacts.

Mitigation of traffic and transport impacts needs to include a sustainable improvement to public transport that will meet the needs of an expanded airport, particularly to the south. It is not plausible that 'no more traffic on the road' can be delivered without improving rail access from the south which (not coincidentally) is the geographic area with the highest mode share for private cars. There is a key link between where those employed by HAL or 'in airport'-related businesses live and areas with better access. More workers living south of the airport drive to work. HAL needs to consider where the future workforce will be secured from and encourage a greater spread of employees with an equitable choice of transport modes around the whole airport region.

Paragraph 5.10.3 (Volume 1, p140) on the draft Code of Construction Practice (CoCP) refers to active workforce management/ worker transport scheme. The peak construction workforce is estimated at between 10-15,000 workers.CON1 stated that there would be no sustainable transport targets or parking restrictions for construction workers to ensure Heathrow was an attractive place to work. With reference to the Consultation 1 materials (Table 2.4 of the Our Approach to Developing a Surface Access Strategy), this could represent a potential uplift in Heathrow related vehicle movements of up to 20%, and is likely to be equivalent to more than all the bus, coach and commercial goods vehicles travelling to or from Heathrow on an average day in 2016. Consequently it is our view that it was unacceptable that there would be no targets or measures proposed to minimise traffic and air quality impacts from this, and thus we welcome the proposed mitigation measures.

Paragraph 5.10.14 (Volume 1, p142) talks about putting Heathrow at the heart of the rail network. The surface access strategy consulted on as part of Consultation 1 assumes new rail infrastructure connecting the Heathrow West terminal area (i.e. T5/T6) to the Windsor Lines and has included a four trains per hour service in their core assessment. This is no mention in the EIA Scoping Report about the role a Southern Rail Access (heavy or light rail) could play in mitigating traffic and transport, air quality and noise impacts.

Paragraph 5.10.25 (Volume 1, p144) discusses the option for a Southern Access Road Tunnel. The potential for rat running through the airport (via the Southern Access Road Tunnel into the CTA and out to the M4 Spur via the existing CTA Tunnel) should be recognised and assessed.

Consultation 1 included an option for a direct link from the off-airport 'cargo city' to the south of the airport and the on-airport cargo facilities to minimise unnecessary HGV movements on the public highways and perimeter roads. This is no referred to at all in the EIA Scoping Report as a mitigation option. This is a serious concern given that Masterplan Assembly Options all seek to expand the cargo facilities in this location. Consultation 1 documentation indicates that moving goods to and from off-airport warehousing represents a third of all Heathrow cargo related trips, so there is very real potential for significant air quality benefits if such a low emission link was taken forward.

Noise

Bullet point 6 of paragraph 16.11.9 identifies the development of a Noise Envelope as a framework for the control of noise effects and to provide certainty about how noise will be managed.

- What metric is to be used and at what level of noise exposure will the envelope apply?
- Over what time periods will the noise envelope apply: presumably daytime 16 hours, but potentially other, shorter time periods and also possibly covering the night-time period?

Additionally, it would be appropriate to set different envelopes for different operating years. One can envisage a set of noise envelopes covering the 'year of maximum exposure' and a set of smaller noise envelopes covering the 'year of maximum operations'. The airport must commit to reducing envelope areas thereafter in order to share the benefits of technological improvements with the affected communities as aircraft continue to become quieter.

Furthermore, information must be provided on the steps that will be taken by the airport to manage its operations within the envelope. In particular, if actual operating conditions differ from those forecast for any given year and a breach of the envelope appears likely, what measures to restrict of control those operations will be taken?

With particular regard to access to quiet open green space, how does HAL propose to mitigate the impacts of a higher frequency of take-off/landings for residents close to the Heathrow Airport boundary and runway in the Stanwell and Stanwell Moor areas?

In paragraph 16.10.119, Heathrow Airport proposed new noise insulation package has been well publicised, along with the associated cost, and is a step change and significant improvement over what is currently on offer. However, we retain the view that it is potentially inequitable in that the same provisions will be made to people/dwellings regardless of how often they are overflown. Residences to the west of the airport will be overflown for at least twice as many days as those living to the east. This factor was established in SoNA 2104:aircraft[3] as being significant in determining the community reaction to aircraft noise.

In line with all airport sound insulation grant schemes, mitigation can only be provided inside dwellings (paragraph 16.10.122), and external amenity spaces will remain unprotected. The same comments apply to paragraph 16.10.123.

[3] CAP 1506, Survey of noise attitudes 2014: aircraft

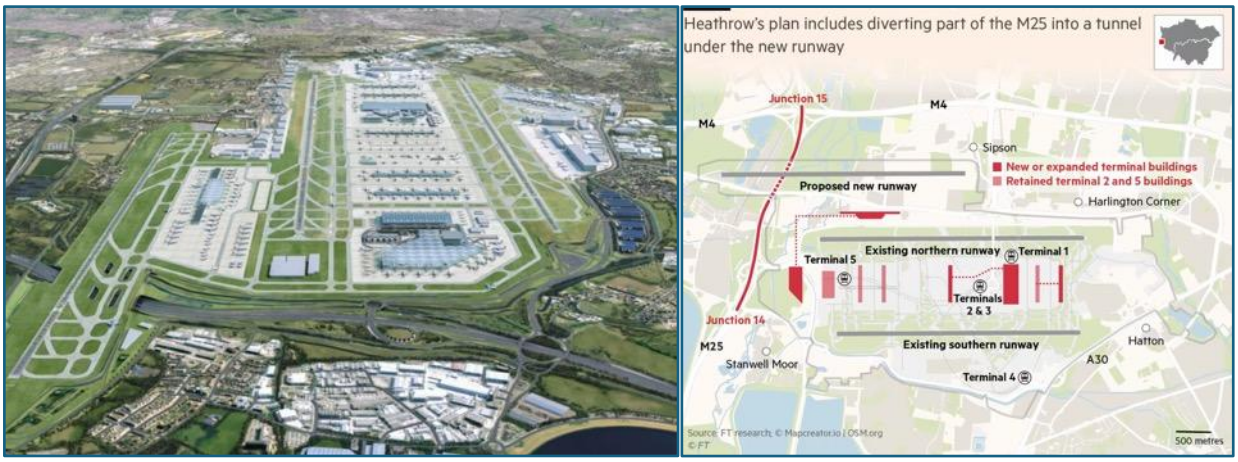
APPENDIX 2:

ECONOMIC DEVELOPMENT RESPONSE (SPELTHORNE)

Matthews Associates

Member of: LAND & REGENERATION PARTNERS

High-Level Review of the Economic Impacts of Heathrow Expansion



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Client: Spelthorne Borough Council

Consultant Team: Simon Matthews & Will Ball – Matthews Associates (UK) Limited

Date: 24th September 2025

1. Purpose

Spelthorne Borough Council has commissioned a desk-based review of the economic impacts of Heathrow Airport Limited's (HAL) proposed third runway. The work will:

1. Review Spelthorne's 2018–2019 consultation response (including the 16 conditions set out in the covering letter).
2. Review Spelthorne's response to CAA's economic regulation consultation on Heathrow's expansion.
3. Compare with HAL's 2018 Scoping Report and 2025 EIA Scoping Report Addendum.
4. Identify which 2019 impacts remain valid, which are omitted or altered, and which new issues have arisen.
5. Benchmark Heathrow against relevant international expansion precedents (light-touch).
6. Consider specific local economic effects (including commercial property prices/rents and SME displacement).

2. Scope of Work

The review will focus on economic impacts, with light-touch cross-references to social, environmental, and policy issues where relevant. Strengthen policy context by noting post-2018 changes—Brexit, COVID-19 impacts on aviation, Net Zero 2050 carbon budgets, and European precedents such as Frankfurt, Schiphol, and Paris CDG.

Key Thematic Areas (for consideration in the wider economic development mix):

- Employment & Skills – local job creation, apprenticeships, Heathrow Academy.
- Business & Supply Chain – SME resilience, relocation/displacement risks.
- Trade & Exports – freight capacity, warehousing pressures, global competitiveness.
- Costs & Finance – spiralling costs, HAL's financial resilience, no public subsidy principle.
- Compensation & Legacy – WPOZ, property price risks, tangible regeneration for Spelthorne.
- Transport & Infrastructure – surface access, freight corridors, induced traffic.
- Cumulative & Long-Term Impacts – labour market pressures, housing, community services.
- Property Market – residential values (WPOZ), commercial rents and SME viability.
- Regeneration – alignment with Spelthorne's town centre and employment sites
- Climate & Net Zero – lifecycle carbon, indirect emissions (Finch), compliance with Net Zero Strategy.
- Policy & Governance – enforceability, Levelling Up Act context, monitoring arrangements.
- International Benchmarks – lessons from European hubs (Frankfurt, Dublin, Schiphol, etc.).
- Freeport Option – feasibility of a Heathrow Freeport with safeguards for Spelthorne.

3. Comparative Framework

Step 1: Baseline Review (2019) – Extract economic issues identified in Spelthorne's full response and covering letter. This includes the 16 conditions (such as 740k ATM cap, no early 25k ATM growth, expanded WPOZ, apprenticeships, Southern Light Rail, opposition to Southern Parkway/Truck Park).

Step 2: 2025 Scoping Review – Assess how HAL's updated EIA Scoping Report addresses each issue, including expanded chapters on economics, carbon/climate, community, and cumulative impacts.

Step 3: Gap Analysis – Highlight areas where Spelthorne's 2019 issues remain unaddressed, are altered, or where new issues (e.g. Brexit, COVID recovery, net zero, commercial rents) have arisen. Consider introduction of a dedicated Community Levy or Benefit Fund, ring-fenced for Spelthorne, to mitigate pressures on local services and infrastructure resulting from Heathrow expansion. Heathrow has pledged 10,000 apprenticeships—Spelthorne should press for specific targets ensuring a fair proportion are offered to local residents, particularly youth and disadvantaged groups.

4. International Benchmarks

The project will light-touch benchmark Heathrow against major European airport expansions with similarities to Heathrow's proposed expansion.

5. Freeport Option

Spelthorne has proposed Heathrow consider a Freeport. Report will give a high-level summary of freeport scenarios and possible impacts for Spelthorne.

6. Deliverables

1. Comparative Matrix (2019 vs 2025 impacts, including new themes).
2. Final Report (structured analysis including benchmarks and Freeport option).

7. Timetable

18-23 Sept: Project undertaken
24 Sept: Draft full report.

8. Assumptions

- Work is desk-based only.
- Focused on key economic impacts relevant to Spelthorne Borough Council
- Source materials: Spelthorne 2019 response & covering letter, CAA consultation response, HAL 2018 & 2025 scoping documents, and updated policy/international evidence. Expansion of Heathrow Airport (Third Runway) Documents (.gov.uk) Strengthen policy context by noting post-2018 changes—Brexit, COVID-19 impacts on aviation, Net Zero 2050 carbon budgets, and European precedents such as Frankfurt, Schiphol, and Paris CDG.

Economic Implications of Heathrow Expansion for Spelthorne

1.0 Introduction

Heathrow Airport's proposed expansion, including a third runway and new terminal capacity – carries significant consequences for the local economy of Spelthorne. As an adjacent Borough (with parts of Stanwell and Stanwell Moor abutting the airport), Spelthorne is both poised to gain from Heathrow's growth and vulnerable to its impacts. Currently about 3,500 Spelthorne residents (7% of the Borough's workforce) work at Heathrow[1], and this number could rise substantially with expansion.

This report outlines key areas of interest, concern, challenge, opportunity, and threat associated with the expansion, focusing on economic impacts (with social and environmental factors included where they economically intersect).

We also reference experiences from similar airport expansions in Europe (e.g. Frankfurt, Paris, Amsterdam) to contextualise these insights. The goal is to help Spelthorne Borough Council maximise benefits for the local economy while mitigating risks.

1.1 Executive Summary

Heathrow's proposed third runway is a defining project for Spelthorne. As the Borough directly borders the airport, the scheme presents both unprecedented opportunities and significant risks. The challenge for Spelthorne is to ensure that the benefits of Heathrow's expansion are secured for its residents and businesses, while the economic, social, and environmental costs are properly mitigated.

A comparison of Heathrow's 2018 Scoping Report with the 2025 EIA Scoping Report Addendum reveals a shift in emphasis. In 2018, economic issues such as job creation, housing pressures, and SME supply chain opportunities were explicitly treated within the "Economics and Employment" chapter. By 2025, many of these themes have been displaced into the "Community" chapter or omitted altogether. Temporary employment effects, workforce-driven housing demand, and property market impacts are now marginalised, while supply chain opportunities and SME resilience are scarcely developed. Surface access improvements once assumed integral, particularly Southern Rail Access have disappeared, and the Western Rail Link remains uncertain.

This reframing of risks underplaying the full economic consequences for Spelthorne. The Borough already contributes significantly to Heathrow's workforce, with c.3,500 [1] residents employed at the airport, and this could rise substantially with expansion. The promise of 26,000+ new on-site jobs and up to 10,000 apprenticeships by 2030 represents a major opportunity to tackle unemployment, raise skills, and provide progression routes for local people. However, unless commitments are quantified and localised, there is a risk that Spelthorne residents will not capture their fair share. At the same time, competition for labour could drain staff from the Borough's retail, care, and hospitality sectors, leaving SMEs struggling to compete on wages. Construction activity will generate thousands of temporary jobs, but experience shows that without local labour obligations, many will be filled by outside contractors.

Property and housing pressures are another critical omission. Expansion will bring new workers and their families into the housing market, fuelling demand and potentially driving up rents and house prices in an already pressured area. Rising commercial rents could displace established local firms, particularly SMEs, unless mitigation is introduced. These issues were recognised in 2018 but are absent from the 2025 Addendum, weakening the economic baseline.

Transport infrastructure remains a decisive factor. Heathrow's economic case depends on improved surface access, yet Southern Rail Access has been dropped, the Western Rail Link is uncertain, and Heathrow's plan now relies heavily on expanded car parking. This risks worsening congestion in Spelthorne, with overspill parking in Stanwell and Staines, and traffic displacement during decades of construction. Without binding commitments to deliver rail connectivity and protect local roads, the Borough faces significant economic disruption.

Beyond these, wider contextual changes since 2018 must inform Spelthorne's position: Brexit and its impacts on trade and labour markets; COVID-19 and its permanent reshaping of aviation demand and working patterns; and the UK's Net Zero 2050 commitments which may cap Heathrow's long-term capacity. International precedents underline the risks: Frankfurt's expansion was curtailed by a night-flight ban, Paris CDG's Terminal 4 was cancelled outright on climate grounds, and Schiphol has been forced to cut flights to reduce noise. Spelthorne must press for guarantees that Heathrow expansion will align with carbon budgets and not expose the Borough to decades of disruption for a scheme later constrained.

The Borough also has an opportunity to advocate for innovative solutions such as Freeport designation for Heathrow, which could attract investment and stimulate logistics and high-value industry locally. But this comes with risks of SME displacement and would ultimately require Government approval, not just Heathrow's.

Recent events also strengthen Spelthorne's negotiating position. The Government's 2025 approval of Gatwick's Northern Runway included robust obligations: surface access "gating" linked to mode-share targets, a £20m Employment, Skills and Business Fund, and dedicated community and housing mitigation funds. These set a precedent Spelthorne can invoke: Heathrow should be required to deliver equivalent binding commitments, with ring-fenced funds and enforceable governance structures.

In sum, Heathrow's expansion still holds the potential to transform Spelthorne's economy. It can deliver jobs, apprenticeships, supply chain opportunities, and global connectivity. Yet without clear commitments, it could also exacerbate housing pressures, displace SMEs, congest local roads, and erode quality of life. The Council's response must therefore be both pragmatic and assertive: supporting expansion in principle, but demanding guarantees on skills, housing, transport, compensation, and sustainability.

Only by securing such protections can Spelthorne ensure that Heathrow's growth delivers a net positive legacy for the Borough.

1.2 Employment and Skills Opportunities

Heathrow's expansion promises a surge in employment opportunities. The airport currently supports around 72,000 on-site jobs (with 114,000 in the wider supply chain) and is expected to grow to roughly 98,800 on-site jobs post-expansion – an increase of about 26,800 roles. Note that the 2025 Addendum relocated temporary employment generation and housing market effects to the Community chapter—risking underrepresentation of economic impacts.

Many of these will be accessible to local people: already, one in four working-age residents in Stanwell North ward is employed at Heathrow[1]. New jobs will range from entry-level to highly skilled. Notably, an expanded Heathrow is projected to offer "careers with progression opportunities, and not just jobs," requiring diverse skill sets[2].

Heathrow Airport Ltd and its partners have committed to pay at least the London Living Wage and to recruit local talent, strengthening income levels for low-income workers. Crucially, Heathrow is also investing in skills development: it has established a skills partnership with local colleges (e.g. Brooklands College) to create a pipeline of trained workers, and with expansion it plans to double the number of apprenticeships across the airport to 10,000 by 2030. Heathrow has pledged 10,000 apprenticeships—Spelthorne should press for specific targets ensuring a fair proportion are offered to local residents, particularly youth and disadvantaged groups.

This includes new degree apprenticeships and technical training (T-level courses in construction), which can substantially uplift the qualifications and career prospects of Spelthorne's residents. Overall, the expansion presents a chance to reduce unemployment and up-skill the local workforce, enabling residents to fill a wide range of roles from engineering and aviation maintenance to customer service.

1.3 Benefits to Local Business and Investment

A larger Heathrow will not only employ more people directly but also stimulate the broader local economy through increased commerce and connectivity. As the UK's busiest hub, Heathrow is already a critical freight gateway – in 2017, £106 billions of UK goods (by value) passed through the airport, more than via the ports of Felixstowe and Southampton combined[5].

Expansion will enhance this role, potentially enabling even more cargo throughput and logistics activity in the area. Local firms involved in freight, logistics, and export-import could see growth in demand, leading to new jobs and business expansion. Spelthorne could explore with Government and Heathrow the potential for Heathrow Freeport designation to attract investment and boost local economy.

An expanded route network (up to 40 new long-haul routes are expected) will improve access to emerging global markets. This makes Spelthorne and surrounding areas more attractive for international businesses and investors who rely on global connectivity. For example, manufacturers or e-commerce companies may find it easier to export products, and multinational firms may choose to locate regional offices near Heathrow to capitalise on convenient travel links. In fact, only 1 in 5 UK small-to-medium enterprises (SMEs) currently export, but the Federation of Small Businesses estimates this could double with Heathrow's expansion if the right support is in place. Spelthorne could explore with Government and

Heathrow the potential for Heathrow Freeport designation to attract investment and boost local economy.

Local businesses are also poised to benefit from supply chain opportunities during both construction and operation. Heathrow's expansion will require vast procurement of goods and services – from construction materials and equipment to catering, maintenance, and professional services once the new facilities open. Heathrow has indicated it will give local companies a fair shot at these contracts, for instance through the annual Heathrow Business Summit which connects airport procurement teams with nearby suppliers. Spelthorne firms (along with those in the four other Boroughs nearest the airport) already enjoy a "competitive advantage" in accessing such opportunities via Heathrow's local supplier workshops.

If proactively leveraged, this could inject millions of pounds into the Borough's businesses, fostering growth in sectors like construction, engineering, retail, and hospitality. Moreover, increased passenger numbers might boost the local tourism and hospitality sector: hotels, guest houses, restaurants, and retail in town centres (e.g. Staines-upon-Thames) could see upticks in customers from airport passengers and staff. In summary, Heathrow's expansion can catalyse inward investment and business growth in Spelthorne, reinforcing the Borough's economic vitality through enhanced trade, procurement, and visitor spending.

1.4 Cross-Sector Employment Impacts and Labour Market Challenges

While the job gains are a clear upside, the expansion could introduce complex dynamics in Spelthorne's labour market. Different sectors and skill levels will be affected in various ways, presenting both opportunities and challenges:

- **Low-Skill Labour Drain:** Better-paying or more attractive jobs at an expanded Heathrow may draw workers away from lower-paid sectors in Spelthorne, such as retail, food service, and other local businesses. Heathrow and its suppliers are London Living Wage employers, which already sets a higher wage floor than many retail jobs. The prospect of stable airport employment with progression paths could entice entry-level workers to leave roles in shops, restaurants, or warehouses in the Borough. This creates a concern for local employers: a tighter labour pool and potential staff shortages in non-airport sectors. For example, a small retailer in Staines might struggle to retain staff if a new Heathrow logistics or retail job offers higher pay or more benefits.

  This wage competition can drive up staffing costs for local firms, possibly leading to price increases or business contraction if they cannot compete for workers. It's an economic challenge to ensure the airport's growth doesn't inadvertently undermine other parts of the local economy by siphoning away the workforce. Note that the 2025 Addendum relocated temporary employment generation and housing market effects to the Community chapter risking underrepresentation of economic impacts.

- **High-Skill Job Opportunities:** Conversely, Heathrow's expansion will generate more high-skill and professional jobs, which is a significant opportunity for Spelthorne. Airports rely on engineers, IT specialists, air traffic managers, aviation planners, and other skilled roles. Additionally, industries that cluster around a major airport – such as aerospace technology, aircraft maintenance, logistics management, and corporate operations for airlines – tend to offer well-paid, career-oriented positions. Having these jobs "on the doorstep" of

Spelthorne can benefit residents with the right skills and education, allowing them to pursue high-value careers without commuting far. It can also encourage skill development in the community: local schools, colleges, and universities may see increased demand for STEM and aviation-related courses, and partnerships like the Heathrow Skills Partnership will enhance access to training.

Moreover, if Heathrow's expansion attracts more aerospace and aviation companies to set up offices or facilities nearby, it could create a cluster of high-tech jobs in the vicinity. This would diversify the Borough's employment base and potentially increase average incomes. The presence of more high-skilled jobs has a strong multiplier effect – estimates suggest that each high-skilled tradeable job (like advanced engineering or R&D) can induce around 2.5 additional local service jobs (e.g. in education, healthcare, retail) through increased spending and demand.

- **Business Relocation and Displacement:** A broader economic consideration is displacement – the possibility that economic activity from elsewhere will relocate closer to Heathrow once it expands. Being near a major airport is advantageous for many businesses due to connectivity and prestige. Empirical evidence from Europe indicates that improved air connectivity tends to boost employment in the airport's home region but can simultaneously lead to a decline in employment in areas just beyond that region, as some businesses move towards the hub (creating an "agglomeration shadow"). In the case of Heathrow, an expanded airport might attract companies currently based in more distant towns to relocate to Heathrow's environs (e.g. into Hillingdon, Hounslow, Spelthorne, Slough).

  For Spelthorne, this could be a double-edged sword: if the Borough can provide attractive sites (business parks, offices, industrial land) and good access to the airport, it could capture a share of these relocating businesses, boosting the local economy. Indeed, the council's economic strategy could market Spelthorne as an ideal location for firms that will benefit from Heathrow's growth. However, if Spelthorne is not competitive (due to land constraints, higher rents, or poorer transport links compared to other Boroughs), it might lose out while neighbouring areas gain the new investments. Additionally, within the Borough, there's a risk that some existing local businesses could be edged out if they cannot afford rising commercial rents or wages in a booming airport-influenced economy. Monitoring these trends and adopting supportive planning policies (such as zoning for commercial development and nurturing small businesses) will be crucial to manage displacement effects. Spelthorne could explore with Government and Heathrow the potential for Heathrow Freeport designation to attract investment and boost local economy.

- **Construction Workforce and Local Employment:** The expansion project – one of the largest infrastructure undertakings in the UK – will create a substantial number of construction jobs and contracts. During peak construction, thousands of workers (engineers, builders, contractors) will be on-site. This offers an immediate opportunity for local construction tradespeople and firms: if they can secure work on the project, it means jobs and revenues staying in the area. Spelthorne's residents with skills in construction, logistics, and engineering could find well-paid work building the runway and associated facilities. However, a challenge is that mega-projects often bring in specialised contractors

from outside the region, who may use their own skilled crews for efficiency. As noted in a 2025 evidence review, the direct construction jobs "will only be temporary and often might not mean employment for people living in the local area if contractors bring staff with them". In other words, without local labour clauses or training initiatives, the community might see the inconvenience of construction without getting its fair share of the employment benefits.

Spelthorne and other local authorities can negotiate with Heathrow on measures like local recruitment targets, apprenticeships in construction trades, and use of local supply chains for materials, to ensure the construction phase boosts the local economy. Even though construction jobs are temporary, they can provide valuable experience and income for residents, and local firms (e.g. equipment rental companies, catering, transport) can benefit from the project's needs. Heathrow has pledged 10,000 apprenticeships: Spelthorne should press for specific targets ensuring a fair proportion are offered to local residents, particularly youth and disadvantaged groups.

- **Housing Market and Public Services:** The influx of workers and new residents tied to expansion will put pressure on housing and services in Spelthorne. During construction, some workers from outside will need temporary accommodation; and once the third runway is operational, many of the 26,000+ new permanent employees will seek housing within commuting distance. Spelthorne could experience increased demand for homes to rent or buy, potentially driving up house prices and rents. This has mixed economic implications: property owners may benefit from rising values (positive wealth effect), and the construction industry may see a stimulus for new housing development.

  On the other hand, higher housing costs can price out lower-income residents and make it harder for local employers (including the Council itself) to recruit staff. There could be a shortage of affordable housing, which is already a concern in much of Surrey. The Heathrow EIA Scoping Report Addendum explicitly recognises these interconnected effects – it plans to assess the "potential effect of employment generation and construction activity on the labour market and subsequently the housing market," as well as the housing impacts of operational jobs. This assessment will inform mitigation strategies, such as whether additional worker accommodation or housing commitments are needed. Public services like schools, healthcare, and public transport may also come under strain with a larger population.

  Conversely, a growing population can attract more government funding and private investment in services. Spelthorne will need to plan for infrastructure and service expansion in tandem with Heathrow's growth so that economic gains are not eroded by overloaded local facilities. Expansion could increase demand for housing, schools, and healthcare. The Council should seek commitments for delivery of new housing and services proportionate to workforce growth.

1.5 Infrastructure, Transport, and Accessibility

A critical factor linking Heathrow's expansion to Spelthorne's economic outcomes is infrastructure – especially transport networks. Improved connectivity can be a boon, while

inadequate transport planning poses one of the biggest threats to local well-being and commerce. Key considerations include:

- **Improved Connectivity:** Expansion is tied to major transport upgrades that could greatly benefit Spelthorne's accessibility. For instance, the proposed Western Rail Link to Heathrow (WRLtH) would connect the airport to the national rail network via Reading, potentially allowing direct trains from Surrey and the west including Staines-on-Thames.

  Additionally, there have been discussions of a Southern Light Rail or other southern access linking Heathrow to the South West Trains network through Spelthorne (though this remains uncertain). If such projects come to fruition, residents and businesses in Spelthorne would enjoy faster, easier trips to Heathrow and central London. (see section 3.0 link).

  This can reduce commute times for airport employees living in Spelthorne and make the Borough more attractive for business investment (a company in Staines, for example, could be only a few minutes rail ride from a global airport). Increased connectivity also facilitates agglomeration – businesses concentrate near transport hubs to leverage better access to suppliers, customers, and talent. In economic terms, better connectivity due to the expansion can raise productivity; one study found that a 10% increase in air traffic is associated with a 3.6% increase in local employment and 2.6% increase in local GDP, largely by enabling growth and efficiency in other sectors.

  Thus, if Heathrow's expansion is accompanied by robust road and rail improvements, Spelthorne's economy could see a positive ripple effect well beyond the airport itself.

- **Traffic and Congestion:** A major concern for Spelthorne is the potential for worsened road congestion. Heathrow is already a huge generator of road traffic (passenger drop-offs, taxis, buses, freight, and staff commuting). Expansion means tens of millions more passengers per year and additional cargo, which, without strong countermeasures, could put strain on local roads like the A3044, A30, A308 and minor roads that people use to access the airport. The Council has flagged that Heathrow's current surface access proposals are inadequate – the Surface Access Strategy (SAS) is "fundamentally flawed" in Spelthorne's view. Plans show a large new Southern Road Corridor and a 22,000-space Southern Parkway (multi-storey car park) on the airport's southern perimeter. Spelthorne fears this could draw heavy traffic through local communities: for example, airport passengers driving from the south or west might cut through Ashford or Sunbury to reach the new parking instead of using the M25. If the M25 is congested, rat-running on residential roads could increase, causing noise, pollution, and safety issues. There's also the issue of rogue parking – travellers might try to avoid parking fees by leaving cars in uncontrolled local streets in Stanwell or Staines. Without preventative measures like Controlled Parking Zones (CPZs), this could overwhelm neighborhood parking.

  For local businesses, more traffic means longer delivery times and discouraged shoppers or clients (who may avoid heavily congested areas). Commuters could face delays, impacting productivity. In economic terms, congestion can act as a drag on growth – time lost in traffic is a cost to workers and companies. It can also deter new businesses or visitors. Thus, managing road congestion is a key challenge. Spelthorne has deemed it "unacceptable" for construction or airport traffic to be routed through its villages (notably

Stanwell Moor) for decades without solutions. The Council will likely push Heathrow for concrete measures: e.g. funding road improvements, enforcing HGV routing that avoids sensitive areas, real-time traffic management plans, and early delivery of new road infrastructure (like diversions or junction upgrades) to handle the increased load. Southern Parkway overspill could affect Spelthorne; Heathrow should fund Controlled Parking Zones and mitigation schemes in affected areas.

- **Public Transport vs. Car Use**: The success of Heathrow's expansion in economic and environmental terms hinges on shifting a large portion of trips to public transport. The Airports National Policy Statement (ANPS) set targets for public transport mode share to ensure that expansion does not cause a breach in air quality limits. Heathrow's plans include some rail and bus improvements, but Spelthorne (and other stakeholders) worry these measures are insufficient.

  The Council's stance is that it is in the process of evaluating a definitive position on what option if any is most appropriate for Spelthorne. Without a new southern rail link, many of the additional passengers and employees will have no convenient alternative to driving from areas south of Heathrow. Spelthorne also notes that Heathrow's proposed demand-management measures (like a potential airport congestion charge or an ultra-low emissions zone) are weak or could backfire. For example, if Heathrow imposes a fee on vehicles entering the airport, it might simply push more cars to park on the outskirts in places like Stanwell and then shuttle in, externalising the problem onto local streets.

  The Council has called for more effective solutions – such as a commitment to deliver Southern Light Rail, enhanced bus routes from Spelthorne towns directly into Heathrow, and measures to discourage through-traffic (like physical restrictions or partnerships with navigation apps to prevent routing through village roads). The economic importance of this cannot be overstated: reliable and efficient public transport to the airport will allow Spelthorne residents to access new jobs without generating gridlock, and it will preserve the local air quality (poor air can lead to health costs and reduce the area's appeal for professionals). Conversely, if public transport improvements lag and car use remains high, Spelthorne could face both environmental penalties (if air quality targets fail) and lost economic potential (due to congestion deterring investment).

  Heathrow's own Environmental Statement will analyse these scenarios; as of the Scoping Addendum, insufficient evidence was available on traffic forecasts through Spelthorne, making it difficult for the Council to judge the claims about air quality impacts. Going forward, securing detailed transport modelling and binding commitments from Heathrow on mode-share targets will be a priority for mitigating this threat. Strengthen policy context by noting post-2018 changes—Brexit, COVID-19 impacts on aviation, Net Zero 2050 carbon budgets, and European precedents such as Frankfurt, Schiphol, and Paris CDG.

- **Long-Term Construction Disruption:** The construction phase of expansion will last many years – potentially from the late 2020s until 2050 for full completion. This prolonged period of works presents an economic threat if not managed carefully. Continuous construction means persistent noise, dust, roadworks, and visual impact. Local shops and services might see fewer customers if certain roads are periodically closed or if construction traffic makes areas less accessible. There could also be short-term population influxes

(construction workers renting locally) followed by outflows, which can destabilise demand for some local housing and services. Particularly concerning is the plan for a major construction consolidation site (code-named CS11) at Stanwell Moor, on Spelthorne's boundary. Residents there face the prospect of HGVs (heavy goods vehicles) and heavy machinery operating near their community 24/7. The Council has stated it is "unacceptable" to rout construction traffic through these villages for decades without robust mitigation. Mitigations might include dedicated haul roads that keep trucks off local lanes, strict timing restrictions to avoid school runs or nighttime, and monitoring/enforcement of traffic routes.

Furthermore, one proposed construction compound lies near Staines Moor (a Site of Special Scientific Interest, valued for its wetland ecosystem) – Spelthorne has emphasised that the project must assess and minimise impacts on this sensitive site. Damage to such an area would not only be an environmental loss but could also diminish local recreation and tourism (anglers, birdwatchers, and walkers use Staines Moor), indirectly hitting the economy. In essence, while construction will bring some jobs and spending, it is a challenging period where negative effects must be mitigated to prevent lasting harm to the Borough's economic and social fabric. Effective communication, compensation, and phasing of works will be needed. The absence of a clear Code of Construction Practice in Heathrow's initial plans was noted as a deficiency by Spelthorne – having a stringent code in place is vital so that issues like noise, dust, working hours, and community disruption are managed and the local economy can continue functioning smoothly throughout the build.

1.6 Environmental and Community Factors Affecting the Economy

Though primarily an environmental and social domain, the impacts on quality of life from Heathrow's expansion will carry economic implications for Spelthorne. Environmental degradation or community unhappiness can translate into economic costs (health expenses, lower productivity, reduced investment) and must be viewed through that lens: Consider the Introduction of a dedicated Community Levy or Benefit Fund, ring-fenced for Spelthorne, to mitigate pressures on local services and infrastructure resulting from Heathrow expansion.

- **Noise and Health Impacts:** Added flights will expand noise exposure across communities, including northern parts of Spelthorne like Stanwell Moor, Stanwell Village, and possibly Ashford. Aircraft noise, especially at night or early morning, has well-documented effects on health – causing sleep disturbance, stress, and cardiovascular issues over the long term. From an economic perspective, health impacts mean more sick days and healthcare burdens, and they can impair children's learning outcomes (affecting future human capital). Spelthorne Council is particularly worried that Heathrow's interim plan to add 25,000 extra flights per year before the third runway opens (through procedural changes like Independent Parallel Approaches) would subject residents to more noise without mitigation in place. This early growth could bring disturbance to areas that were previously quieter, and the Council argues there should be "no early growth" until proper noise insulation and respite measures are implemented.

  The proposed night flight ban associated with expansion is also a point of contention: Heathrow's offer (5 hours 55 minutes ban each night) falls short of the 6.5 hour ban promised in the Airports National Policy Statement. In practical terms, that difference

could mean several more flights in the late evening or very early morning, keeping residents awake. The World Health Organisation recommends an 8-hour quiet period at night for health – far more than Heathrow's plan. If noise impacts are not fully addressed, the desirability of living or working in the affected parts of Spelthorne may drop, which could lower property values and discourage the inward migration of talent or businesses. On the flip side, mitigating noise (through bans, flight path alternation, home insulation schemes, etc.) has an economic benefit by preserving community health and contentment. At this stage, Heathrow has not provided a detailed Health Impact Assessment on the effects of new flight paths, something the Council will press for. Ultimately, safeguarding residents' health is not just a social imperative but an economic one – a healthier community is more productive and incurs fewer public costs. Spelthorne should push for expansion of the Wider Property Offer Zone to include Stanwell and Stanwell Moor, ensuring property owners have access to compensation/insulation schemes.

- **Air Quality and Climate:** Expansion will increase aircraft emissions on the ground and in the air, as well as road traffic emissions if mode shift targets aren't met. While Heathrow insists it can expand within legal air quality limits, there will inevitably be areas with worsened air pollution (even if still under the limit values). Spelthorne's view is that even non-breach worsening of air quality is significant for health and thus unacceptable. Pollutants like NO_2 and fine particulates contribute to respiratory and cardiac illnesses. In economic terms, this means higher medical expenditures and lower labour productivity (people unwell or caring for sick family members). If parts of Spelthorne see an air quality decline, it could also affect the Borough's image – for instance, a company might think twice about locating a regional HQ in an area known for poor air quality, due to employee well-being concerns.

  Furthermore, the climate impact of expansion is under scrutiny. The project will increase UK aviation carbon emissions at a time when the country is legally committed to Net Zero by 2050. Spelthorne's response highlights that Heathrow's growth trajectory may not fit within the Committee on Climate Change's advised aviation carbon cap (37.5 Mt CO2 in 2050) unless major offsets or an emissions trading mechanism is applied. If climate policies tighten – as seen by the government's insistence that any scheme align with carbon goals – Heathrow could face operational constraints or additional costs (like carbon pricing) which might reduce the economic boost. For instance, if by the 2030s the UK government or international bodies impose a strict carbon cap on Heathrow's flights, the airport might not fully utilise the new runway, limiting job growth from what was anticipated.

  There's also reputational risk: businesses today often have their own sustainability targets and might be reluctant to align with or move near a project perceived as environmentally detrimental unless it demonstrably mitigates emissions. On the positive side, Heathrow's expansion could drive green innovation – e.g. commitments to use sustainable aviation fuels, electric ground vehicles, and solar energy could create new green jobs and supply chain opportunities in the area. Spelthorne should encourage Heathrow to pursue such measures aggressively, turning a potential threat into an opportunity (positioning the Borough as a centre for green aviation technology).

- **Loss of Green Space and Amenities**: One of the stark local impacts will be land use change on the southern side of the airport. Approximately 220 hectares of Green Belt land in Spelthorne are slated for compulsory acquisition to accommodate airport facilities and re-routed roads. This represents about 4.3% of the Borough's total Green Belt being lost – a significant hit in a Borough that values its limited open spaces. Areas like Stanwell Moor and parts of Stanwell would see fields and open land replaced by tarmac, buildings, or earthworks. Beyond the environmental loss, there's an economic dimension: green spaces contribute to property values and draw people to live in an area. They also support recreation (which, though not a big "industry," has value – e.g. local sports, walking groups, even just the wellbeing of workforce). Spelthorne is concerned that Heathrow's proposed "green loop" (a corridor of parkland and pathways around the airport) is insufficient compensation for the loss of existing open spaces. If the character of villages like Stanwell Moor shifts from semi-rural to industrial, there could be an exodus of those who can afford to move, leaving a less affluent population behind and reducing the local customer base for some businesses.

  Moreover, without adequate replacement amenities, the liveability of the area could decline, making it harder to attract the kind of skilled workers the local economy needs. No community facilities (such as new parks, community centres or sports facilities) are currently proposed as part of Heathrow's expansion package in Spelthorne, which the Council finds disappointing. A "world-class" expansion, they argue, should leave a positive legacy – for instance, creating new public amenities, not just taking them away. For the local economy, a positive legacy could mean enhanced tourism appeal (if, say, a new nature reserve or visitor attraction were created as part of landscape re-design) or simply maintaining a high quality of life that keeps entrepreneurial and high-skilled individuals in the Borough.

- **Community Compensation and Property Impacts:** Heathrow's expansion will directly impact certain communities in Spelthorne (particularly Stanwell Moor and Stanwell Village) through noise, construction, or proximity to new facilities. Typically, infrastructure projects offer compensation or property buyout schemes for those most affected. However, Spelthorne Borough Council has criticised Heathrow's current compensation proposals as falling short of "world class" standards. Notably, there is no provision to offer buyouts (with a 25% uplift on value) for homeowners in Stanwell Moor/Village – Heathrow has not acknowledged these areas as being newly significantly impacted, despite the encroachment of new development and traffic toward them. This means residents just over the border from the airport expansion may see their property values depressed (because of noise or nuisance) yet have no recourse to sell to Heathrow and relocate. From a social equity perspective, this is a major concern, but it also has economic implications: if parts of Spelthorne become less desirable and no compensation is given, those residents lose wealth (negative wealth effect) and are less able to invest in improvements or move within the local area. It can also create pockets of blight where properties might not be maintained or new families are unwilling to buy in.

  The Council also notes that Heathrow's proposed Community Compensation Fund – a pot of money to be distributed for community projects – is not structured to give a "lion's share" to the most affected communities. Without targeted community investment, the areas

bearing the brunt might not see meaningful improvements to offset the negatives. Ensuring a fair and substantial compensation/mitigation package (including things like enhanced home insulation, property buy-out options, new community infrastructure, and long-term funds for local initiatives) is not just about fairness; it would help maintain community cohesion and stabilise the local economy. If people feel assured their community will be improved (or at least not left worse), they are more likely to stay, spend, and invest locally rather than leave at the earliest chance. Consider the introduction of a dedicated Community Levy or Benefit Fund, ring-fenced for Spelthorne, to mitigate pressures on local services and infrastructure resulting from Heathrow expansion. Spelthorne should push for expansion of the Wider Property Offer Zone to include Stanwell and Stanwell Moor, ensuring property owners have access to compensation/insulation schemes.

In summary, the environmental and social impacts of Heathrow's expansion – noise, air quality, loss of land, community upheaval – are interwoven with the economic health of Spelthorne. A deterioration in living conditions can erode the economic gains of new jobs by driving costs up and driving people out. Conversely, strong mitigation and community benefits can enhance the net economic outcome, by ensuring that those who live and work in Spelthorne are healthier, happier, and more likely to remain active contributors to the local economy.

1.7 Opportunities and Threats: A Summary Perspective

- **Opportunities:** Heathrow's expansion offers Spelthorne substantial economic opportunities. It will bring thousands of new jobs within easy reach of residents – not only in aviation and airport operations but across construction, retail, hospitality, engineering, and professional services. Many of these jobs come with higher wages and career progression, improving local earnings and spending power. The expansion is also a chance to boost the Borough's skills base through apprenticeships and training initiatives linked to the airport. Improved global connectivity could put Spelthorne on the map for inward investment, attracting businesses that want to be near an expanded international hub. Local enterprises stand to gain from airport-related contracts and a larger customer base (airport workers and passengers) – the Council can help by ensuring awareness and access to Heathrow's procurement opportunities.

  There is also potential for a positive spillover effect: the presence of a bigger airport can stimulate improvements in infrastructure (roads, public transport, digital connectivity) and catalyse regeneration. For example, areas of North Spelthorne might see redevelopment or new commercial projects geared toward serving the airport and its workforce. If well managed, the expansion could thus be a cornerstone for local economic growth over the next several decades, reinforcing Spelthorne's position as a key player in the regional economy around Heathrow.

- **Threats and Challenges:** Alongside the opportunities, there are serious threats and challenges that could undermine the local economy if not addressed. One major threat is to other local businesses and sectors – a sort of crowding-out effect where the airport's labour demand leaves shops, small businesses, and public services understaffed (because workers migrate to Heathrow jobs) or facing higher wage bills to retain staff. This could particularly hit lower-paid sectors and smaller firms, potentially leading to business

closures or reduced services in the community. Another challenge is infrastructure strain: more people and activity can overwhelm roads, public transport, and housing if expansion isn't matched with timely upgrades. Congestion and longer commutes would hurt productivity and deter visitors or investors. Likewise, if housing supply doesn't keep up, affordability issues could push working families further out, altering the social mix and consumer base of the Borough. Environmental threats loom large – increased noise and pollution might make parts of Spelthorne less liveable, which in the long run can erode property values (diminishing residents' wealth) and make it harder to attract and retain skilled workers (who may choose to live in quieter areas and commute from farther, or take jobs elsewhere). The loss of green spaces and community facilities without adequate replacements could reduce recreational opportunities and community wellbeing, indirectly affecting the attractiveness of the Borough for both people and businesses.

There are also project risks to consider: if the expansion falters (due to legal challenges, funding issues, or policy changes), Spelthorne could experience years of disruption and blight (from preparatory works or safeguarded land) without the payoff of the full economic benefits – a worst-of-both scenario. Uncertainty itself can be damaging; for example, if the completion stretches to 2050, investors might hold off on local projects due to the unknown future landscape. In essence, the expansion could strain the very fabric of the local economy – its diverse sector balance, its infrastructure capacity, and its environmental capital – if mitigating actions are not taken. Expansion could increase demand for housing, schools, and healthcare. The Council should seek commitments for delivery of new housing and services proportionate to workforce growth

- **Spelthorne Borough Council** will need a proactive strategy to navigate these factors. It should leverage the opportunities by upskilling residents, promoting local businesses to Heathrow's supply chain, and marketing the Borough for investment. Simultaneously, it must blunt the threats by working with Heathrow on comprehensive mitigation: demanding sufficient transport infrastructure, enforcing environmental limits, securing compensation and community benefits, and planning for housing and public service needs. With such measures, Spelthorne can aim to maximise the net positive impact of expansion while safeguarding the quality of life that underpins its economy. The Council should seek commitments for delivery of new housing and services proportionate to workforce growth. Lessons from Other European Airport Expansions (Addendum)

1.8 International Context

While Heathrow's expansion is unique in scale and context, experiences from other major European airports offer instructive parallels on economic impacts and the importance of mitigation:

- **Frankfurt Airport (Germany):** Frankfurt Airport opened a fourth runway in 2011 to increase capacity. Economically, this bolstered Frankfurt's status as an aviation hub and secured its role as one of the largest employment centres in Germany – the airport now supports over 80,000 jobs on site, similar to Heathrow's scale. Local businesses benefited from increased connectivity, and there were significant construction works generating regional economic activity. However, the expansion ignited community opposition over noise. German courts ultimately imposed a strict ban on night flights (11:00 PM to 5:00 AM) as a

condition for the runway's operation (Heathrow's current night quota is already 23:30 to 06:00 although Spelthorne previously responded it fell short of the ANPS 6.5-hour ban and of the WHO-recommended 8-hour night quiet period). This highlights that economic growth came with trade-offs: the night flight ban likely constrained some cargo operations and airline scheduling, potentially reducing some economic throughput, but it was deemed necessary to protect residents' health. Lesson for Heathrow/Spelthorne: Be prepared for and open to operational limits (like night curfews) as part of the expansion. Such measures can actually enable expansion to proceed by addressing the worst community impacts. From Frankfurt we learn that a balance must be struck – economic benefits were delivered, but only alongside robust noise mitigation. It also underscores the value of early engagement with residents: had noise concerns been better addressed upfront, costly legal battles might have been avoided. For Spelthorne, Frankfurt's case suggests pushing for firm noise controls (e.g. enforceable quiet hours, flight path alternation agreements) which, in the long run, can coexist with a thriving airport economy.

- **Paris Charles de Gaulle (France):** CDG, Europe's second-busiest airport, had planned a major expansion via a new Terminal 4, projected to handle an extra 40 million passengers annually and create 50,000 jobs. Economically, this would have been a huge boon, reinforcing Paris's global connectivity and generating local employment. However, in 2021 the French government scrapped the project entirely, citing climate change commitments and environmental concerns. The project was deemed "obsolete" in a future where France aims to curb aviation emissions. This was a dramatic example of environmental policy overriding economic and aviation expansion plans. For the local economy around CDG, this meant foregoing the additional jobs and investment, at least in the short term. The operator, Groupe ADP, is now looking at smaller-scale, sustainable upgrades instead. Lesson for Heathrow/Spelthorne: Long-term climate goals can significantly alter the feasibility of airport expansion. Heathrow's expansion must align with the UK's carbon reduction pathway to avoid a similar fate. Spelthorne should be aware that if Heathrow cannot convincingly demonstrate sustainability (through measures like improved aircraft efficiency, carbon offsetting, and integrating with broader low-carbon transport policy), there is a risk of higher authorities pulling the plug or scaling back the project, which would mean lost economic opportunities. On the other hand, if done right, expansion could proceed in a moderated form that still brings jobs but with greener operations. Paris's case shows the importance of flexibility and sustainability – plans may need to adapt (e.g. phased expansion or capacity limits) to meet environmental imperatives, and local economies must be ready to adjust to a possibly smaller or slower growth scenario than originally pitched.

- **Amsterdam Schiphol (Netherlands):** Schiphol has long been near its capacity limits and under intense pressure over noise and emissions. Rather than physical expansion, recent developments involve capacity restrictions. The Dutch government moved to cap Schiphol's annual flight movements, initially proposing a reduction from 500,000 to 440,000 flights to reduce noise, then moderating to a cap of 478,000 after consultations. Airlines and business groups pushed back, highlighting potential economic losses (Schiphol is crucial to the Netherlands' connectivity and logistics). Legal challenges ensued, focusing on whether proper process was followed (under EU "Balanced Approach" rules) in imposing the cap. The outcome is still evolving, but it's clear that environmental limits are forcing even one of the world's busiest airports to sacrifice growth. Locally, this

means Schiphol's surrounding region might see less job growth than anticipated, and some aviation-related businesses might curb expansion. However, it also addresses community concerns and could spur investments in noise reduction technology and quieter aircraft. Lesson for Heathrow/Spelthorne: Even after expansion, airports may face operational caps if environmental conditions worsen or if promised mitigations don't materialize. Heathrow has committed to not increase airport-related road traffic and to stay within air quality limits – failing these could trigger government intervention or lawsuits that cap activity, which in turn caps economic benefits. Spelthorne should thus insist on realistic assessments and contingency plans: what if certain noise or air targets are missed? Will there be penalties or adjusted operations? For the Borough, it's better if Heathrow expansion operates within sustainable parameters than to grow rapidly and then be forced into sudden cutbacks. The Schiphol experience demonstrates the value of incremental growth tied to proven mitigation success (a step-by-step approach), rather than a "grow first, fix later" approach which can backfire.

- **Key Lesson – Balancing Growth and Liveability:** Across these examples, a common theme emerges: the tension between economic growth and environmental/social constraints. Airports bring jobs and prosperity, but also noise, congestion and emissions. Successful expansions (or continued operations) increasingly require a social license to operate – buy-in from communities and alignment with environmental standards. Heathrow's expansion will need to earn that license from Spelthorne and other Boroughs. Measures like the Heathrow Community Compensation Fund, noise insulation schemes, and local infrastructure investments shouldn't be viewed as afterthoughts; they are integral to the project's viability. For instance, Heathrow might consider funding new community amenities in Spelthorne (as partial recompense for the disruption), much as some European airports have built schools, parks or sports facilities for their neighbours. Additionally, workforce development programs (like the Heathrow Academy's outreach in schools) can ensure the next generation in Spelthorne is prepared to seize the skilled jobs an expanded airport offers.

Ultimately, the European lesson for Spelthorne is one of proactive engagement and negotiation: by learning from others, the Council can better advocate for outcomes where the local economy thrives without the local community suffering unduly. This means pushing Heathrow to go beyond minimum requirements – e.g. stricter night noise restrictions as in Frankfurt, stronger climate action to avoid cancellations as in Paris, and concrete caps or reviews to prevent overshoot as being attempted in Amsterdam. It's about finding the equilibrium where Heathrow's success and Spelthorne's prosperity reinforce each other, underpinned by sustainable practices and mutual trust between the airport and its neighbours.

1.9 Conclusion

The Heathrow expansion presents a defining opportunity for Spelthorne, one that could shape the Borough's economic landscape for decades. On one hand, it promises expansive growth: more jobs for residents, higher incomes, improved skills, and greater business connectivity on a global stage. It stands to reinforce Spelthorne's role as a vital cog in the UK's transportation and logistics network, bringing prosperity and new experiences to the community. On the other hand, it carries significant risks that cannot be ignored: strain on infrastructure and housing, pressure on local businesses and labour markets, and environmental impacts that could diminish the quality of life. The balance between these forces will determine whether the net effect is overwhelmingly positive, or whether gains in one area are offset by losses in another.

For Spelthorne Borough Council, the task is to maximise the upside and mitigate the downside. This involves active collaboration in planning – ensuring that the socio-economic assessment is thorough and that Heathrow's development consent obligations include tangible benefits for the Borough. It means lobbying for the delivery of promised infrastructure like the Western Rail Link and pursuing new opportunities like a Southern Rail link, to prevent traffic chaos. It also means standing firm on environmental and community protections: insisting on better noise abatement, air quality monitoring, green space preservation, and compensation for those affected. The Council's response to the 2018 Scoping Report and the 2025 Addendum shows a keen awareness of these issues, and that advocacy must continue throughout the planning examination.

In summary: Heathrow's expansion can be a catalyst for Spelthorne's economic renaissance – but only if growth is achieved in harmony with the community's needs and the environment's limits. By learning from other airports, rigorously planning for change, and securing commitments for investment in the local area, Spelthorne can turn this immense project into a platform for sustainable economic development. The coming years will be crucial: with wise strategy and strong partnership between the Council, Heathrow, and the community, the Borough can ensure it reaps the rewards of expansion while building resilience against its challenges. The watchword for Spelthorne is balance – balancing interest with concern, opportunity with challenge – to deliver a thriving local economy in the next chapter of Heathrow's history.

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[1] [2] [3] [4] [5] [6] [7] [8] [9] [14] [17] [18] [19] [20] [21] [22] [23] [25] [26] [27] [28] [29] [30] [31] [32] [33] [34] [35] [36] democracy.spelthorne.gov.uk

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2.0 Spelthorne Borough Council – Scoping Responses Table

Chapters reviewed: 2018 EIA Scoping Report (Ch. 9 Community; Ch. 10 Economics & Employment) and 2025 EIA Scoping Report Addendum (Ch. 9/10). References shown inline.

Page	Section Title	Comment	Report ref
Ch. 10 (2018 §10.4)	Economics & Employment	2018 report recognised risk of labour market distortion with airport jobs attracting staff away from local retail, care, and hospitality. This issue is not revisited in 2025 Addendum. Request ES explicitly assess local sector impacts and mitigation (support for SMEs, wage monitoring).	Link
Ch. 10 (2025)	Economics & Employment	2025 Addendum notes job creation but lacks quantified commitments on apprenticeships, degree apprenticeships, and T-levels. Request ES include specific targets for local residents, with monitoring.	Link
Ch. 10 (2018/2025)	Economics & Employment	Construction jobs referenced, but insufficient recognition that contractors may import external staff. Request local labour obligations, apprenticeship quotas, and on-site training partnerships with local colleges.	Link Link
Ch. 10 (2025)	Economics & Employment	Housing and public service pressure from additional workers noted superficially. Request ES provide detailed modelling of housing demand, affordability, and impacts on healthcare/education capacity, with mitigation commitments.	Link
Ch. 10 (2018)	Economics & Employment	2018 report recognised potential supply chain opportunities for SMEs. Addendum does not update or quantify. Request Heathrow commit to SME procurement targets and local supplier engagement programmes.	Link
Ch. 10 (2025)	Economics & Employment	Air freight growth noted as economic benefit, but Addendum omits potential HGV congestion and local road impacts. Request ES consider logistics corridor impacts in Spelthorne and propose freight consolidation centre strategy.	Link
Ch. 10 (2025)	Economics & Employment	Freeport or customs innovation potential not referenced. Request ES consider scope for Freeport designation at Heathrow and benefits to local economy.	Link Link

Ch. 10 (2018/2025)	Economics & Employment	Neither report assesses commercial property market. Expansion could raise rents, displacing SMEs in Spelthorne. Request ES consider impacts on local business space affordability and mitigation (e.g. safeguarded SME space, rate relief).	Link
Ch. 10 (2025)	Economics & Employment	Housing market effects mentioned but not developed. Request ES explicitly model property price and rental effects for Spelthorne residents.	Link
Ch. 9 (2018/2025)	Community	Both reports reference community disruption but omit detailed economic impacts of prolonged construction (to 2050). Request Code of Construction Practice address business continuity, traffic disruption, and compensation for lost trade.	Link
Ch. 9 (2025)	Community	Stanwell Moor construction site (CS11) and HGV routing threaten village economy and quality of life. Request ES assess localised economic impacts and require dedicated haul routes, timing restrictions, and mitigation funding.	Link
Ch. 9 (2025)	Community	Construction traffic and road closures likely to reduce footfall in Staines town centre and other high streets. Request economic assessment of retail trade impacts and inclusion of mitigation package.	Link
Ch. 10 (2018/2025)	Economics & Employment	Economic benefits are predicated on surface access improvements. Request ES scenario-testing of outcomes with/without Southern Rail Access, WRLtH, and M25 junction upgrades.	Link Link
Ch. 9/10 (2025)	Community/Economics	Southern Parkway (22,000 spaces) risks inducing car traffic and overspill parking into Spelthorne. Request ES evaluate displacement parking impacts and fund Controlled Parking Zones (CPZs).	Link
Ch. 9 (2025)	Community	M25 realignment and M4/M25 junction upgrades pose risk of construction disruption and congestion spillover. Request ES provide traffic modelling for Spelthorne routes (A30, A308) and mitigation commitments.	Link Link
Ch. 9 (2018/2025)	Community	Noise: 2018 report acknowledged effects but 2025 Addendum omits cumulative health/productivity impacts. Request ES	Link

		quantify economic costs of noise (lost productivity, health burden) and mitigation.	
Ch. 9 (2025)	Community	Air quality: Addendum recognises risk of worsening but insufficient assessment of economic health costs. Request ES quantify productivity losses and NHS cost implications for Spelthorne.	Link
Ch. 9 (2025)	Community	Loss of 220ha Green Belt in Spelthorne (4.3% of borough) acknowledged only as land use. Request ES assess economic value of green space loss (property desirability, recreation, wellbeing impacts).	Link
Ch. 9 (2025)	Community	Compensation proposals exclude Stanwell Moor/Village buyouts despite new significant impacts. Request ES consider property value impacts and expand compensation to affected communities.	Link
Ch. 9 (2025)	Community	Community Compensation Fund structure not clearly favouring most impacted areas. Request ES commit to proportional allocation with Spelthorne priority funding.	Link
Ch. 10 (2025)	Economics & Employment	Neither report incorporates Brexit impacts on trade, customs processes, or labour market. Request ES update economic baseline to reflect post-Brexit realities.	Link Link Link
Ch. 10 (2025)	Economics & Employment	COVID-19 not referenced. Pandemic altered aviation demand patterns and hybrid working trends. Request ES re-forecast demand and employment based on revised industry projections.	Link Link Link
Ch. 10 (2025)	Economics & Employment	Net Zero 2050 legislation and carbon budgets since 2018 not fully integrated. Request ES demonstrate how expansion aligns with CCC carbon caps and implications for long-term job security.	Link Link
Ch. 10 (2025)	Economics & Employment	International precedents (Frankfurt night ban, Paris CDG cancellation, Schiphol caps) omitted. Request ES consider lessons learned and risks to Heathrow's projected economic case.	Link Link

2.1 Summary Note: Expanded Scoping Responses Table

Purpose

This note explains the rationale behind the expanded entries added to Spelthorne Borough Council's Scoping Responses Table for Heathrow Expansion (Chapters 9: Community, and 10: Economics & Employment). It summarises why each issue has been raised, the risks / opportunities for Spelthorne, and what the Council seeks in Heathrow's Environmental Statement (ES).

2.1.1 Employment & Skills

- **Job Creation vs Local Displacement**: The 2018 report recognised risks of Heathrow pulling staff from local retail, care, and hospitality. The 2025 Addendum omits this. Council requests explicit assessment and mitigation through SME support and monitoring.
- **Apprenticeships & Training:** 2025 references jobs but lacks quantifiable commitments. Council seeks binding targets for apprenticeships, degree apprenticeships, and T-level pathways for local residents. Heathrow has pledged 10,000 apprenticeships: Spelthorne should press for specific targets ensuring a fair proportion are offered to local residents, particularly youth and disadvantaged groups.
- **Construction Jobs**: Both reports underplay the risk of external contractors dominating. Council requests local labour obligations and training partnerships with colleges.
- **Public Services Pressure:** Workforce growth impacts on housing, healthcare, and schools are only superficially addressed. Council calls for modelling and funded mitigation. Expansion could increase demand for housing, schools, and healthcare. The Council should seek commitments for delivery of new housing and services proportionate to workforce growth.

2.1.2 Business & Supply Chain

- **SME Procurement**: 2018 flagged SME opportunities; 2025 does not update or quantify. Council demands Heathrow commit to SME procurement targets and local supply chain inclusion.
- **Freight & Logistics**: Air freight growth is noted, but road congestion and HGV impacts on Spelthorne are not. Council requests an ES assessment plus freight consolidation measures.
- **Freeport Option**: Neither report considers Freeport designation, which could bring investment. Council recommends inclusion of Freeport potential.

2.1.3 Property & Commercial Space

- **Commercial Property Rents**: Both reports omit the risk of commercial rent inflation displacing SMEs. Council seeks assessment and safeguarding of affordable SME space.

- **Housing Market Effects:** 2025 touches on housing but lacks detailed modelling. Council requests ES to assess property values and rental affordability impacts. Expansion will increase demand for housing, schools, and healthcare. The Council should seek commitments for delivery of new housing and services proportionate to workforce growth.

2.1.4 Construction Phase Disruption

- **Economic Impacts of Long Build:** Disruption through 2050 is not properly addressed. Council demands the Code of Construction Practice include business continuity and compensation measures. Spelthorne could explore with Government and Heathrow the potential for Heathrow Freeport designation to attract investment and boost local economy.
- **Stanwell Moor Compounds**: Construction compounds and HGV routing could harm local economies. Council calls for haul route management and mitigation funding.
- **Town Centre Footfall**: Road closures and diversions will cut high street trade. Council seeks retail trade impact assessment and mitigation packages.

2.1.5 Infrastructure Dependency

- **Surface Access Dependency**: Economic benefits rely on rail/road schemes. Council requests scenario testing with/without Southern Rail Access, WRLtH, and M25 upgrades.
- **Southern Parkway & Parking Spillover**: 22,000-space car park risks car traffic and overspill parking in Spelthorne. Council requests parking displacement assessment and CPZ funding. Southern Parkway overspill could affect Spelthorne; Heathrow should fund Controlled Parking Zones and mitigation schemes in affected areas.
- **M25 & Junction Upgrades**: Major roadworks risk traffic displacement into Spelthorne. Council requests detailed modelling and mitigation commitments.

2.1.6 Community & Quality of Life (Economic Crossover)

- **Noise Impacts:** Health and productivity losses are omitted in 2025. Council requests ES quantify economic costs of noise exposure. Spelthorne should push for expansion of the Wider Property Offer Zone to include Stanwell and Stanwell Moor, ensuring property owners have access to compensation/insulation schemes.
- **Air Quality**: Addendum recognises worsening but not economic costs. Council requests ES assess NHS and productivity implications.
- **Green Belt Loss**: 220ha (4.3% of Spelthorne) lost. Council requests ES assess economic value of green space loss.
- **Compensation Coverage**: No buyouts for Stanwell Moor/Village. Council seeks expanded property compensation.
- **Community Fund:** Allocation not proportional. Council requests clear funding commitments for Spelthorne. Consider the introduction of a dedicated Community Levy or Benefit Fund, ring-fenced for Spelthorne, to mitigate pressures on local services and infrastructure resulting from Heathrow expansion.

2.1.7 Policy & Global Context Since 2018

- **Brexit**: No reflection on changed trade/customs and labour market. Council requests updated baseline.
- **COVID-19**: Pandemic impacts on demand omitted. Council requests revised forecasts.
- **Net Zero 2050**: Expansion alignment with carbon budgets not demonstrated. Council requests evidence of compatibility.
- **International Precedents**: Key examples (Frankfurt, Paris, Schiphol) omitted. Council requests inclusion of comparative risk analysis.

2.1.8 Summary Conclusion

The expanded Scoping Responses Table captures employment, business, property, construction, infrastructure, community, and policy changes relevant to Spelthorne's economy. Each row represents either: - An omission in the 2025 Addendum versus 2018; or - A new factor since 2018 (policy, global economics, or precedent).

This ensures Spelthorne's response is robust, comprehensive, and positions the Council to secure local protections and benefits from Heathrow expansion.

3.0 Addendum: Transport Priorities for Heathrow Expansion

This checklist summarises the transport infrastructure priorities that Spelthorne Borough Council should press for in its response to Heathrow Airport Limited's third runway proposals and associated Development Consent Order (DCO) process.

3.1. Priority Checklist

1. M25 Realignment & Capacity – Ensure the realignment/tunnelling of the M25 (J14–J15) is fully funded, minimises construction disruption, and delivers long-term capacity to avoid traffic displacement into Spelthorne.

2. M4/M25 Junction Upgrades – Secure redesign and capacity enhancements at M4 J4, J4b and M25 J13–J14 to prevent rat-running through Staines, Ashford, and local roads.

3. A30/A308 Corridor Improvements – Require Heathrow to fund junction improvements, freight routing controls, and active travel schemes to maintain traffic flow and reduce local congestion.

4. Southern Access (Rail/Light Rail) – Insist that Southern Light Rail via Staines or equivalent is delivered in parallel with the Western Rail Link, so that Spelthorne secures direct public transport benefits.

5. Local Road Reconfiguration – Ensure any changes to the Southern Perimeter Road and Stanwell Moor routes include bypass/relief options to protect residential communities from displaced airport traffic.

6. Public Transport Services – Demand new express bus/rapid transit links from Staines, Ashford, and Sunbury to Heathrow terminals, with guaranteed funding and service frequencies.

7. Freight and Logistics – Require freight consolidation centres and designated HGV routing to keep heavy traffic off residential streets and safeguard Spelthorne's road network.

3.2. Council Position

Spelthorne supports Heathrow expansion in principle for its economic benefits, but only if surface access is upgraded equitably. The Council should:

- Press for Southern Access rail/light rail to complement Western Rail Link.
- Secure road and junction improvements on A30/A308 and M25/M4 interchanges.
- Insist on freight and traffic management to protect residents.
- Ensure public transport enhancements directly benefit the borough.

4.0 Annex: High-Level Summary Comparative Table of 2018 vs 2025 Heathrow Expansion Scoping Reports

This annex presents a comparison of how key economic and community impacts were treated in the 2018 EIA Scoping Report versus the 2025 Addendum, with Spelthorne Borough Council's recommended position.

2018 Scoping Report	2025 Addendum	Spelthorne Council Ask
Employment impacts central in Ch.10 (Economics & Employment).	Temporary job creation moved to Community Ch.9; less emphasis in Ch.10.	Ensure full quantification of job creation, training, and apprenticeships remain in Economic chapter with monitoring.
Housing market effects assessed under Economics.	Housing pressures relocated to Community; property values scoped out.	Model workforce-driven housing demand and affordability; include commercial property effects and mitigation.
Surface access improvements assumed (Southern Rail, WRLtH, M25).	Southern Rail/Light Rail omitted; WRLtH uncertain; M25 realignment included.	Reinstate Southern Rail priority; secure binding commitments on WRLtH and M25 mitigation.
Noise and compensation noted; insulation/mitigation zones defined.	Wider Property Offer Zone unchanged; property value impacts excluded.	Expand WPOZ to Stanwell/Stanwell Moor; assess property market impacts and extend insulation scheme.
Supply chain and SME opportunities highlighted.	SME impacts mentioned but not quantified.	Set SME contract targets; publish procurement reporting; fund local supplier gateway.
Community effects identified, with draft Code of Construction Practice referenced.	Construction disruption acknowledged but not tied to binding CoCP obligations.	Require CoCP to include business continuity, haulage routing, compensation for lost trade.
Context: pre-Brexit, pre-COVID, Net Zero not binding.	Context updated but limited reference to Brexit, COVID, Net Zero 2050, international precedents.	Integrate updated context: labour shortages post-Brexit, hybrid working, CCC carbon budgets, international precedents (Frankfurt, Schiphol, Paris CDG).

5.0 Addendum: Gatwick Northern Runway approval - what changed, and why it matters to Spelthorne

What was announced (Sun 21–Mon 22 Sept 2025)

- The Secretary of State granted the Development Consent Order (DCO) for Gatwick's £2.2bn plan to shift the emergency/northern runway 12m north and bring it into routine use. Target operation by ~2029, adding ~100,000 flights/year and ~14,000 jobs, with c. £1bn/yr economic benefit projected.
- The decision letter confirms approval with added operational controls (noise/traffic) and a strengthened surface access regime, after the SoS was "minded to grant" in Feb and sought further views.
- Government/public sources emphasise that Gatwick's capacity adds to, rather than substitutes for, Heathrow capacity under the ANPS, i.e., "additional to, or different from, that which would be met by any Heathrow scheme." (Decision letter, para 4190–4191).
- The DCO can be challenged by judicial review within 6 weeks; the Order comes into force 12 Oct 2025.

Why it matters for Spelthorne's Heathrow response

1) London capacity context / policy direction

The approval signals a pro-growth stance on UK airport capacity when paired with continued policy support for Heathrow expansion. It does not remove need in the ANPS for Heathrow's scheme; the SoS explicitly assigns positive need weight to Gatwick in addition to any Heathrow capacity. This strengthens the case that both schemes may proceed (subject to conditions), so Spelthorne should maintain a robust mitigation ask rather than assume Gatwick reduces Heathrow pressure.

2) Useful benchmarks from Gatwick conditions (transferable 'asks' for Heathrow)

Gatwick's DCO and associated obligations provide a live template for what central government is willing to secure today. Spelthorne can reference these when pressing Heathrow:

- Surface access "gating" tied to mode-share thresholds – Dual-runway operations and opening of key facilities can be conditional on hitting public transport mode-share (e.g. 54%) or equivalent trip caps / completion of national highways works. The decision references a requirement 20 structure and SACs (Surface Access Commitments). Staff travel targets trend to ≥60% sustainable modes over time. Use this to argue for hard triggers at Heathrow (e.g., no capacity step-ups without rail delivery/targets met).
- Employment, Skills & Business Strategy (ESBS) + dedicated fund – Gatwick's package includes an ESBS with a £20m fund to maximise local employment and SME benefits, tailored to local baseline/skills needs. Spelthorne should press Heathrow for quantified apprenticeship targets, SME procurement gateways, and a funded ESBS aligned to Spelthorne's labour market.
- Community funds and social mitigation – The SoS gives positive weight to targeted measures including a Gatwick Community Fund (administered via local Community Foundations) and a Homelessness Prevention Fund—explicit recognition of housing/social stress from workforce growth. Spelthorne can seek equivalent ring-fenced Spelthorne Community Benefit Fund + housing/social investment commitments from Heathrow.
- Monitoring, governance & partner sign-off – The SoS expects statutory consultee sign-off for deviations from surface access commitments and ongoing engagement via a Transport Forum Steering Group—useful governance levers for Heathrow (e.g., quarterly mode-share reporting, CPZ funding triggers).
- Section 106 framework with local authorities – Gatwick's S106 (with Crawley BC/West Sussex CC) secures mitigation packages and governance for delivery (including the Community Fund schedule). Spelthorne can reference this current practice to justify strong S106-style obligations with Heathrow (e.g., overspill parking/CPZ funding, local skills delivery plans, small-business support).

Specific ideas Spelthorne can lift from Crawley's playbook

(Indicative—drawn from the SoS decision/SACs/S106 narrative and recent local authority materials)

1. Hard surface-access conditions: No phased capacity release at Heathrow unless mode-share and road-traffic thresholds are met; require rail milestones (e.g., Southern Access/WRLtH) as prerequisites.
2. Local ESBS fund: Heathrow to endow a multi-year Employment, Skills & Business Fund (Gatwick set £20m); include targets for apprenticeships and SME contract share in Spelthorne.
3. Community & housing mitigation: Heathrow to create/expand a Spelthorne Community Fund and a Housing/Homelessness Prevention Fund to relieve pressure from construction/operational workforce growth.
4. Parking & local roads: Secure funded CPZs, staff parking controls, and a non-car travel plan with annual compliance reporting; condition new car parks on prior delivery of highways/public-transport works.
5. Transparent governance: Statutory consultee sign-off for any relaxation of access commitments; Heathrow to co-chair a Transport/Community forum with Spelthorne and Surrey CC.

Bottom line for our Heathrow report

- The Gatwick DCO raises the bar on enforceable mode-share gating, skills/community funds, and local governance.
- It strengthens Spelthorne's negotiating hand to request similarly robust, funded and testable obligations from Heathrow—especially on surface access triggers, community/skills funding, and parking/CPZ mitigation.
- It does not diminish the need case for Heathrow; rather, it confirms government appetite for multiple capacity solutions subject to tighter mitigation—so our Spelthorne response should lean into Gatwick's precedents to hard-wire protections and benefits locally.

Key sources:

- Gov't decision notice & Planning Inspectorate page (grant of DCO, conditions, JR window).
- Decision letter extracts on mode-share gating, ESBS (£20m), Community Fund, Homelessness Fund, staff sustainable travel targets.
- Press reporting on jobs/benefits, timeline, and climate debate.

5.1 Comparison Table: Gatwick DCO Obligations vs Potential Heathrow Asks for Spelthorne

This table sets out key obligations and mitigation measures secured at Gatwick under the 2025 Northern Runway DCO, and the equivalent asks Spelthorne could press for in Heathrow's expansion process.

Gatwick DCO Obligations (2025)	Equivalent Heathrow Ask for Spelthorne
Surface access gating: capacity release conditional on meeting mode-share targets; Requirement 20 controls; Transport Forum governance.	Link phased capacity release at Heathrow to delivery of Southern Rail/WRLtH and mode-share thresholds; create Heathrow Transport Forum with Spelthorne sign-off.
Employment, Skills & Business Strategy (ESBS) with £20m fund to support apprenticeships, local labour and SMEs.	Require a funded Heathrow Employment, Skills & Business Fund with clear Spelthorne quotas for apprenticeships and SME procurement share.
Community Fund and Homelessness Prevention Fund to address local housing/social impacts of growth.	Establish a Spelthorne Community Benefit Fund and Housing Mitigation Fund to offset housing/service pressures.
Parking controls: conditions on new car parks tied to highways/public transport delivery; CPZs funded.	Secure Heathrow funding for Controlled Parking Zones in Stanwell/Stanwell Moor; tie car park approval to rail/highway upgrades.
Governance: statutory consultee sign-off for access commitments; Transport Forum Steering Group monitoring.	Give Spelthorne statutory consultee status for Heathrow surface access; require quarterly reporting and joint governance of mitigation funds.
Section 106 agreements with Crawley BC/West Sussex CC securing mitigation package and governance structures.	Negotiate binding Section 106-style agreement for Spelthorne covering skills fund, CPZs, business support, and community levy.

6.0 Annex: Freeport Status for Heathrow – Implications for Spelthorne

Should Spelthorne Press for Heathrow to be Considered as a Freeport?

Background

The UK Government established Freeports in 2021 as special customs and tax zones designed to encourage trade, inward investment, and innovation. While most current UK Freeports are seaports, airports (e.g. East Midlands Airport Freeport) are eligible. Spelthorne councillors have asked whether Heathrow could or should be designated a Freeport as part of its expansion.

Positive Potential Impacts for Spelthorne

- Enhanced Trade & Logistics Hub: A Heathrow Freeport could strengthen the Borough's role in global supply chains, attracting logistics, advanced manufacturing, and e-commerce businesses to nearby sites.

- Job Creation & Skills: Freeports often stimulate both low- and high-skill employment, from warehousing to advanced aerospace and life sciences.

- Business Incentives: Tax reliefs (business rates retention, enhanced capital allowances, employer NIC relief) could attract new occupiers into Spelthorne, potentially regenerating commercial estates.

- Global Branding: Linking "Heathrow Freeport" with Spelthorne could elevate the Borough's profile internationally, especially with investors.

Potential Negative Impacts & Risks

- Displacement of Businesses: Benefits may accrue to businesses relocating from other parts of the UK, rather than net new growth. Spelthorne could face rising land and rental values, potentially squeezing existing SMEs.

- Inequality of Benefits: Freeport incentives may concentrate gains around logistics and high-growth sectors, while not addressing pressures on housing, schools, and healthcare.

- Customs Control: Freeports require strict customs boundaries. Security, compliance, and HMRC monitoring would create operational complexities at Heathrow.

- Local Congestion/Environmental Stress: Increased freight and logistics activity could exacerbate already significant concerns over HGV traffic, air quality, and carbon targets.

Governance: Heathrow vs Government Control

- Government Role: Freeport designation is a Treasury and DLUHC decision, not within Heathrow Airport Limited's gift. The policy requires central Government to invite bids and designate sites.

- Airport Role: Heathrow could partner in a bid or advocate for inclusion in future Freeport rounds. The airport would need to work with local authorities, LEPs and the GLA to put forward a case. Spelthorne cannot compel Heathrow but could lobby Government with Heathrow's support.

- Uncertainty: Current Government policy capped the number of English Freeports (eight announced in 2021, plus further green ports in Scotland and Wales). An expansion of the programme would be a political decision.

International and UK Examples

- East Midlands Airport Freeport (UK): Focuses on express freight (DHL hub) and advanced manufacturing; expected to generate c. 60,000 jobs regionally.

- Shannon Free Zone, Ireland: One of the earliest airport-linked Freeports, created in 1959, catalysing regional economic development but with mixed longer-term displacement effects.

- Dubai Airport Free Zone (DAFZA): Integrated into Dubai International, hosts 2,000+ companies across logistics, tech, and life sciences, showing how airports can anchor global trade platforms.

Conclusion & Recommendation

- Yes, Spelthorne should explore this strategically, but with realism: Heathrow cannot unilaterally declare Freeport status. Any request would need to be directed to the UK Government, ideally with Heathrow as a supportive partner.

- The Borough should ask Heathrow to jointly lobby Government to assess Freeport designation, while insisting on safeguards to prevent SME displacement and to secure commitments to local labour, housing, and transport mitigation.

- Even if designation is not immediately feasible, raising this option positions Spelthorne as forward-thinking and ensures the Borough is at the table if future Freeport rounds are announced.

References

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