Heathrow Expansion National Policy Statement (HENPS) Consultation – 2026

Response from Spelthorne Borough Council
(September 2026)

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1. Introduction

1.1. This document presents Spelthorne Borough Council's (SBC) response to the draft revision to the Airports National Policy Statement. The key document considered in the preparation of this response is the proposed "Heathrow Expansion National Policy Statement" (HENPS) and its supporting appendices.

1.2. Please note that Spelthorne and Runnymede Councils are part of Local Government Reorganisation and from 1st April 2027, will form part of a new West Surrey Unitary Authority. The Council has therefore been corroborating closely with Runnymede Borough Council and Surrey County Council on matters relating to the proposed expansion of Heathrow Airport.

1.3. This response is a combined Technical Officers' response with delegated authority to provide comments on behalf of the organisation. There are around 103,300 residents within the Council's administrative area.

1.4. Please note that as a two-tier local authority currently, Spelthorne Borough Council (SBC) supports the views offered in the response to the HENPS from Surrey County Council (SCC), particularly in its role as highway authority.

1.5. In addition, Spelthorne Borough Council is a member of the Heathrow Strategic Planning Group (HSPG) and is therefore also party to, and in support of, the consultation response (and views therein) submitted by that organisation to the HENPS consultation.

1.6. This response does not duplicate responses where the necessary points have been made by SCC and HSPG.

2. To what extent do you agree or disagree with the assessment of the need for the proposed expansion of Heathrow Airport?

2.1. It is widely recognised that the need for the expansion of Heathrow Airport has been debated for many years, with particularly intense focus on this issue over the last 20 years as seen through the publication of the Air Transport White Paper, *The Future of Air Transport*, 2003, the Aviation Policy Framework of 2013, the Airports Commission Report of 2015, and the Airports National Policy Statement of 2018. Over this time, aviation demand, for business, freight, and leisure, continues to grow, and various Governments over the years have published position statements accompanied by these policy documents on how the United Kingdom should plan to accommodate future aviation demand.

2.2. However, returning to 20+ years ago, the Air Transport White Paper of 2003 mooted the additional development of Heathrow, with a further new runway and additional terminal

capacity, *to be delivered as soon as possible (within the 2015 – 2020 period),* ***but only if stringent environmental limits can [sic] be met (emphasis added).***

2.3. There is no harm in revisiting this 2003 Paper which was guided by the need for a balanced and measured approach to the future of air transport, which:

- Recognises the importance of air travel to national and regional economic prosperity, and that not providing this additional capacity would significantly damage the economy and national prosperity;
- Reflects people's desire to travel further and more often by air and to take advantage of the affordability of air travel and the opportunities that this brings;
- Seeks to reduce and minimise the impacts of airports on those who live nearby, and on the natural environment;
- Ensures that, over time, aviation pays the external costs its activities impose on society at large; the price of air travel should reflect its environmental and social impacts;
- Minimises the need for airport development in new locations by making best use of existing airports where possible;
- Respects the rights and interests of those affected by airport development;
- Provides greater certainty for all concerned in the planning of future airport capacity.

2.4. The above principles still hold true in considering the case for the need to expand Heathrow Airport. Whilst economic growth could be achieved at a regional and national level, this would be accompanied by a complex swathe of environmental and social implications that would result from expansion. The environmental and social capacity of the region to accommodate the expansion must be respected, with limitations and supporting mitigations established at the outset; effectively, a growth envelope with defined parameters that must not be breached, and that over time, may in fact be improved upon to the benefit of residents and communities.

2.5. In this context, and against the backdrop of evidence published over the course of many years, there is a more nuanced response to this question, which is how to establish an appropriate scale of growth (i.e. the 'need'), with associated economic benefits that flow from this, and balance this with the environmental and social consequences that would arise, such that there are not unacceptable residual cumulative impacts, which remain unmitigated, for existing residents, businesses, and communities within the zone of influence.

2.6. Spelthorne Borough Council adopted its Local Plan in March 2026. Together with addressing material considerations relating to new development that may be impacted by airport operations, Policy SP7: Heathrow, considers 'A potential Expansion at Heathrow' and offers conditional Council support for future expansion at Heathrow Airport *if it is undertaken in a sustainable and integrated way (emphasis added).* The reasoned justification for Policy SP7 states that the Council will support a future expansion (in principle) as it recognises the potential economic benefits and opportunities that an

expanded Airport could bring to Spelthorne, the wider Southeast, and the UK as a whole. However, its support is dependent on the promoter making sure that the proposed scheme comprehensively and effectively mitigates the impacts it will have on the authority's communities, businesses, services, and environment.

2.7. The approach set out in Policy SP7 of the Spelthorne Local Plan reflects the position of the Council when the draft Local Plan was submitted for examination in November 2022. No amendments to this section of the Policy were made during the examination process, however, in light of the time that has elapsed, officers are working with Members to revisit the scheme, explore proposed changes, and support them in reaching an up-to-date and informed position on the current scheme.

3. The government has proposed four tests which must be met for expansion to proceed. To what extent do you agree or disagree with how the government has set each of the 'four tests'?

3.1. The clarification of the principal tests, under four broad headlines, which must be met for expansion to proceed, is helpful. At a high level, these reflect elements of Policy TR7: **Marine ports, airports, and other aviation facilities**, of the National Planning Policy Framework, August 2006 (NPPF), which states in part 2 that:

"All development proposals to which this policy applies should have an acceptable environmental effect in terms of noise, air quality, greenhouse gas emissions, the transport network, landscape, visual and marine impacts, taking into account any applicable standards and relevant national decision-making policies in this Framework."

3.2. However, the breath of technical information that these four headline tests cover is extensive, and hooks must be in place in the HENPS to facilitate detailed, explicit, and measurable parameters to ensure that all relevant considerations have a place for assessment (and naturally, mitigation) through the relevant consenting process under these four tests. Moreover, whilst not covered by the 'four tests', matters relating to the impact on (and capacity of) the transport network, and landscape and visual impacts, as well as other relevant development management considerations, should not be neglected in any consideration of proposals to expand Heathrow Airport.

Air quality

3.3. The Spelthorne Local Plan 2026 (SLP) sets out in Policy E4 that the Council will seek to protect and improve the Borough's air quality by ensuring all development complies with national policy and guidance at the most up to date Air Quality Action Plan. For development proposals that could potentially cause, exacerbate, or introduce new exposure to poor air quality, mitigation and compensation measures should be incorporated.

3.4. The publication of the NPPF 2026 post-dates the adoption of the Spelthorne Local Plan. Chapter 17 of the NPPF (Pollution, public protection, and security), states in Plan-making Policy P1: Planning for clean and safe places, that development proposals, taking into account the potential for mitigation, will not cause unacceptable levels of pollution, either alone or in combination with other pollution sources, taking into account communities which may be particularly vulnerable to its effects, such as children and older people, as well as habitats and species that may be vulnerable to pollution. Policy E4 of the SLP is considered to have strong consistency overall with the NPPF, noting however the additional emphasis now placed on cumulative environmental impacts and public health in the NPPF.

3.5. Decision-making Policy P3: Living conditions and pollution, of the NPPF, states that development proposals should not give rise to, or contribute to, unacceptable levels of air pollution on or beyond the site. Adverse impacts should be avoided where possible or mitigated to an acceptable degree.

3.6. In this context, Spelthorne Council corroborates the submission by SCC and HSPG on Air Quality matters. In addition, it sets out its own detailed response in respect of the approach in the HENPS to Air Quality in Appendix A attached to this submission.

Noise

3.7. The Spelthorne Local Plan 2026 (SLP) sets out in Policy E4 that the Council will seek to protect and improve local noise conditions as far as reasonably practicable.

3.8. The publication of the NPPF 2026 post-dates the adoption of the Spelthorne Local Plan. Chapter 17 of the NPPF (Pollution, public protection, and security), states in Plan-making Policy P1: Planning for clean and safe places, that opportunities should be taken to reduce noise pollution, and contribute to compliance with national and local environmental targets and objectives. Policy E4 of the SLP is considered to have strong consistency overall with the NPPF, noting however the additional emphasis now placed on cumulative environmental impacts and public health in the NPPF.

3.9. Decision-making Policy P3: Living conditions and pollution, of the NPPF, states that development proposals should not give rise to, or contribute to, unacceptable levels of noise on or beyond the site. Adverse impacts should be avoided where possible or mitigated to an acceptable degree.

3.10. In this context, Spelthorne Council corroborates the submission by SCC and HSPG on Noise matters. In addition, it sets out its own detailed response in respect of the approach in the HENPS to Noise in Appendix A attached to this submission.

3.11. Notably, the ‘golden thread’ running through the Council’s response in respect of noise matters is that the framework for decision making through the DCO process should not

lose sight of the approach in the Aviation Policy Framework (APS) of 2013, which sets out the desire to utilise noise envelopes as a means of giving certainty to local communities about levels of noise that can be expected in the future. Paragraph 3.29 of the APS states that, within the limits set by the [noise] envelope, '*the benefits of future technological improvements should be shared between the airport and its local communities to achieve a balance between growth and noise reduction' (emphasis added*).

3.12. In other words, the net reduction in the noise envelope through improvements in technology, such as quieter aircraft, as well as changes to airspace to manage and reduce noise impact, should not be exchanged for an equal proportionate increase in ATMs within the limits of the noise envelope to the sole benefit of the Airport operator. The underlying principle in the APS, which is still in force, is that communities should see a share in the benefits arising from technological advancements through improvements to the local noise environment. Whilst this sharing of technological benefits is referenced in paragraph 5.45 of the HENPS (under mitigation), the mechanism for assessing, monitoring, and implementing this is not set out; this should be clarified through the DCO decision-making process as it is an important principle that should not be lost in the consenting process.

Climate change mitigation

3.13. The Council notes the requirement for the applicant to submit a Carbon Management Plan, across the full lifecycle of the project, and this is supported. However, the bullet points in paragraph 5.74 do not set out an obligatory framework; they use language such as '*drive down carbon impacts'* and whether residual carbon impacts will be *voluntarily* offset.

3.14. Under mitigations relating to Air Travel, the HENPS recognises that the reduction of aviation emissions is a challenge and therefore appears to rely on a comprehensive package of mitigation measures to secure whole project decarbonisation (effectively delivering a net offsetting of aviation emissions). Whilst this is set within the overall target to achieve net zero emissions across the whole package of air travel, surface access, and construction, there is not a mechanism in the HENPS to measure this and demonstrate that net zero can be achieved. Moreover, the HENPS accepts at paragraph 5.88 that any increase in carbon emissions because of the development alone is not a reason to refuse development consent; *but that the increase in carbon emissions resulting from the proposed scheme must not be so significant that it would have an impact on the UK's legally binding carbon targets.* However, the consequences for the applicant of failing to meet this are not set out in the HENPS and this is a cause for concern, given the significant risks presented by climate change impacts.

Economic growth across the country

3.15. Much of the case for expansion of Heathrow is predicated on the economic benefits that would arise; indeed, the opening sentence of the HENPS states that '*the Government announced its support for a third runway at Heathrow Airport as part of its plans to go further and faster to kickstart economic growth*.'

3.16. As one of the 'four tests', the evidence that economic benefits will be felt at the national, regional, and local levels, the HENPS expects the applicant to provide whole economy modelling techniques to show these benefits. Whilst the overall economic growth benefits are readily understood, and supported, the nuance here is ensuring that the HENPS provides a framework for decision-making through the DCO process that secures the delivery of these benefits in practice, particularly at the local level where communities are most directly impacted.

3.17. The Council would therefore expect the framework to be in place to ensure the submission of an economic impact assessment showing direct economic benefits (on-airport and off-airport), indirect/induced economic benefits (such as spin-off supporting sectors), catalytic benefits (relating to the wider role of the Airport in attracting investment and businesses to an area) and community benefits, such as offering opportunities for education and upskilling for local residents, and supporting local communities through the proposed community environmental fund.

3.18. Benefits should not be considered in isolation from the wider factors that create a successful functional economic area. Without adequate housing (for local residents, as well as employees during the construction phase and post commencement of operation of the expanded Airport), transport connections – private, public, on bicycle and on foot – and labour supply, an economic area will fail to deliver fully its benefits.

3.19. The matter of surface access arrangements to the Airport is covered in more detail under the relevant consultation question below.

4. To what extent do you agree or disagree that the proposed mitigation measures for environmental impacts resulting from Heathrow expansion requirements are deliverable, effective and proportionate?

4.1. The HENPS sets out a framework for an applicant to submit information through the DCO process that sets out the environmental impacts that would result from the expansion of Heathrow. However, by inference, paragraph 5.347, which notes that the Government supports the Airports Commission's recommendation for an additional component of ongoing community compensation proportionate to environmental impacts, and paragraph 5.348 referring to the 'environmental harm' caused by the expansion of the Airport, net environmental harm will still remain on implementation of the scheme.

4.2. In this respect, whilst the HENPS sets out a framework for mitigation measures, it is clear that even with these, residual environmental impacts will remain, as acknowledged by the text in paragraphs 5.347 and 5.348. It follows, therefore, that the mitigation measures

could go further and by implication, therefore fall short in terms of their effectiveness and proportionality.

4.3. In addition, whilst the HENPS provides a policy framework for the applicant to present the environmental impacts of its scheme, the complexity of the interactions between the environmental parameters means that it is not possible to gauge whether the suite of monitoring and mitigation measures are deliverable, effective, and proportionate.

4.4. Whilst the HENPS is a policy framework, it is difficult to understand the overall growth envelope; i.e. the environmental capacity for the expansion, because the HENPS does not establish defined parameters. Consideration should be given to requiring through the DCO process the establishment of framework of environmental limits and a mechanism for monitoring them, overseen by an independent body, in order to understand when they are reached or exceeded. By ongoing monitoring and offering early mitigation, the environmental capacity will be maximised, allowing controlled growth to occur within a framework that provides mitigation for affected communities from the outset.

5. Do you agree or disagree that the proposed ban on scheduled night flights for Heathrow following expansion should be defined based on the time a 'plane takes off or lands' instead of 'departure from and arrival to terminal'?

5.1. To determine an appropriate mechanism for enforcing the proposed ban on scheduled night flights, the answer to this should flow from the purpose for this ban. The ban is proposed due to the recognised impacts on health of communities disturbed by aviation noise. The mechanism used to define the parameters of the ban on scheduled night flights should ensure the best outcome for these communities and align with Policy P3 (2) (a) of the NPPF which sets out that **development should provide healthy living conditions and avoid noise exposure that could have an unacceptable adverse effect on health or quality of life. Where necessary, *suitable mitigation measures should be incorporated to secure acceptable living conditions (emphasis added).***

5.2. It is therefore important that the proposed ban on scheduled night flights should secure an acceptable noise environment, with definitive and therefore predictable periods of respite for communities affected, and that the impact of not only airborne noise, but also late night, or early morning, ground operations within proximity of neighbouring communities, should be acknowledged and addressed in the management of night flight impacts.

5.3. It is noted that this section refers to a proposed ban on scheduled night flights. It is recognised that, for operational reasons, there are times when air traffic movements (ATMs) need to take place outside the window when nighttime flights are banned, and for which a quota system operates for airlines to allow pre-determined levels of exceptions to the nighttime ban. In considering proposals for expansion at the Airport, and delivering a mechanism for banning nighttime flights, acknowledgement should be given to the proportionate growth in demand for exceptional ATMs arising from an overall increase in ATMs, and therefore the proportional increase in the impact that this could

still have in terms of noise and sleep disturbance for affected communities. This makes the need for predictable nighttime respite periods even more critical.

6. To what extent do you agree or disagree with the proposed designation of Heathrow expansion as defined in the draft HENPS as Critical National Growth Infrastructure (CNGI)?

6.1. Further evidence is required to understand the justification for this designation, and to conclude with a view on the extent of agreement or disagreement on the designation of Heathrow expansion as CNGI. In the meantime, commentary on the application of this designation is set out below.

6.2. The proposed definition of Heathrow as Critical National Growth Infrastructure (CNGI) is predicated on the economic need case set out in paragraphs 2.10 to 2.37 of the HENPS. This economic need case is presented as overriding, and flowing from this, the principle of the need for growth in any testing of a scheme for expansion at the Airport is non-negotiable. It is this clear need set out in the HENPS that has justified the proposed designation of the expansion of Heathrow as CNGI. This proposed CNGI designation brings with it a policy presumption in favour of CNGI, with paragraph 4.17 setting out when the CNGI applies. Essentially, this allows for (ergo, accepts) the identification of negative impacts arising from the proposal, and enables them to be mitigated through the hierarchy of avoid, reduce, or offset impacts, as long as tests relating to air quality, noise, climate change, and economic growth, are satisfied. This framework ***allows for residual impacts*** and states that ***it is unlikely that consent will be refused*** on the basis of these residual impacts.

6.3. The proposed designation of the expansion proposals as CNGI sets a high bar in terms of the planning balance, offering a very significant presumption in favour of development, even in the event of adverse residual impacts in relation to environmental and social considerations.

6.4. Paragraph 4.21 of the HENPS does states that exceptional circumstances may outweigh the CNGI presumption. These exceptional circumstances include where residual impacts present an unacceptable risk to, or unacceptable interference with human health, public safety, defence, irreplaceable habitats or flood risk.

6.5. However, 'unacceptable' is not quantified in the HENPS. Indeed, it goes on in section 4 to provide a framework to allow the applicant to follow the mitigation hierarchy (avoid, reduce, mitigate, compensate) with the applicant having to make sure that residual impacts are clearly defined and harm articulated. The HENPS also makes it clear in paragraph 4.25 that a *significant reduction* in passenger capacity as a mitigation measure is not appropriate, albeit a small reduction may be appropriate. This leads on to the principle in paragraph 4.26 that compensation (whilst not reducing adverse effects per se) could be delivered to address residual impacts *as far as practicable.*

6.6. Concluding, paragraph 4.29 of the HENPS makes it clear that where residual non-HRA impacts remain after the application of the mitigation hierarchy, these are unlikely to outweigh the need for CNGI, and that *in all but the most exceptional circumstances, it is unlikely that consent will ~~not~~ [sic] be refused on the basis of these residual impacts.*

6.7. It is here that the crux of the issue lies, in terms of potential impact on affected communities. The designation of the expansion of the Airport as CNGI is a very high bar to overcome in the planning balance in terms of ensuring that those affected by the proposals are not left adversely impacted, whereby the scheme has a significant detrimental impact on their health and well-being; and how the potential adverse impacts that would arise from the expansion proposals for local communities and residents are managed and mitigated. Given the presumption in favour of development offered by the CGNI designation, to address this, the framework for monitoring, managing and mitigating adverse impacts of expansion in the HENPS needs to be clear, robust, and implementable, to provide reassurance to those affected communities and residents therein that the implementation of a scheme through the Development Consent Order (DCO) process will not be detrimental to their quality of life as a result of the presumption offered by the proposed CGNI designation.

7. To what extent do you agree or disagree that the compensation for affected residents is fair?

7.1. Whilst the HENPS sets out proposed mitigation in the form of community compensation for affected residents and communities, there is still some uncertainty regarding the geographical areas covered (as this is reliant on the mapping of proposed noise contours), and therefore the specific level of compensation proposed for those affected residents and communities. It is evident from the HENPS that whilst those most directly impacted will be compensated through compulsory acquisition with an uplift over market value in the compulsory acquisition zone (CPZ), and others will be fully compensated for the cost of noise insulation, those in the 57 dB LAeq 16 hr, or the 55 dB Lden, noise contours of the expanded airport (whichever measure is the bigger) will be eligible for a contribution of *up to £3,000* for acoustic insulation.

7.2. For the residents of Spelthorne Borough, falling within land alongside the CPZ, a couple of uncertainties arise here:

- The exact extent of the geographical areas to which the noise insulation compensation payments will be applicable is not yet clear;
- There is no indication of when the noise insulation payment will become available during the implementation of the scheme – mitigation should not be retrospective;
- The compensation is caveated as a *contribution of up to £3,000* – the application of this 'contribution up to' mechanism is not clear and should be made explicit as it is currently worded, it leaves scope for the contribution to be less than £3,000;
- There is no explanation as to how the figure of £3,000 has been calculated to justify its clear relationship and proportionality to impacts;

- The £3,000 compensation payment does not appear to be index linked which means that over the timeframe for the implementation of the expansion proposals, this will fail to keep up with the relative to the cost of the installation of acoustic insulation for residents.

7.3. Whilst the HENPS expects the applicant to detail the compensation mechanisms and their administration through the DCO process, the framework for this provided by the HENPS should be strengthened in respect of the above bullet points.

7.4. Paragraphs 5.347 to 5.349 refer to Government support for ongoing community compensation proportionate to environmental impacts, accepting that there will be environmental impacts; *The Government expects that the size of the community environmental fund will be proportionate to the environmental harm caused by the expansion of the Airport.* There is an indicative figure of £50 million per annum over a 15-year period, totalling £750m to be distributed to local communities. It is not possible to gauge from the HENPS whether the mooted £50million annual fund is proportionate or reasonable, nor what this can fund in terms of compensation. Moreover, the HENPS does not state how this will be generated and therefore, whether it is achievable, realistic, or guaranteed. Moreover, it needs to be index linked over the proposed 15-year period otherwise it will represent a gradually depleting source of funding over time.

7.5. In summary, further clarification is required on the mechanism for collecting and distributing the community environmental fund, to ensure that this can be captured through the DCO process and that it is distributed fairly and can make a difference to all affected communities, not just those who have the knowledge and expertise to tap into the fund. Whilst it provides hooks for the applicant to work with affected authorities, the HENPS could be stronger in this regard as currently drafted.

7.6. Further details of the Council's response to mitigation and compensation measures are set out in the Table in Appendix A of this response.

8. To what extent do you agree or disagree with the requirements for surface access, including the passenger mode share targets, and the Surface access vision document? Please also provide any further comments you may have on surface access.

8.1. Surrey County Council (SCC), as the designated Highway Authority covering Spelthorne Borough, has prepared comments relating to the proposed surface access provisions in the HENPS. This response aligns with the comments made by SCC and is also concerned about the apparent failure in the HENPS to ensure that the delivery mechanism for, and funding of, a new direct rail connection to Heathrow is integral to the consideration of the proposed expansion scheme. With additional passenger numbers, and the requisite need for additional staff, arising from the growth of the Airport, the trip generation on the road

network is potentially exponential, and risks undermining the whole objective of maximising the economic benefits of Airport growth.

8.2. Moreover, the local authorities surrounding the Airport are still expected to deliver significant housing and economic growth to meet the Government's objectives for new housing delivery, alongside managing the impacts of the expansion of Heathrow, which will add additional pressures to the road network and other transport infrastructure.

8.3. Modes of transport other than the private car are critical to ensuring the health and prosperity of a functional economic area, and the HENPS misses an opportunity to elevate the importance of this, and critically, to secure funding for the delivery of public transport improvements, **integral to the expansion proposals for the Airport**, in the future decision-making framework for a DCO.

8.4. Indeed, in the decision-making section on page 88 of the HENPS, the measures to address impacts flow largely from monitoring and performance below expected targets; this is reactive and allows the impact to happen before measures are taken to address it. Concerns here are that the measures to address surface access are significant infrastructure projects which are potentially worthy of consideration under a DCO process on their own. This will mean that there are delays (and indeed, potentially no certainty due to their complexity, and the absence of identified funding streams) in the delivery of necessary transport infrastructure such that travel patterns become engrained and the areas surrounding the Airport have to live with the consequences of severe cumulative impacts on the local road network, to the detriment of their health and well-being.

9. To what extent do you agree or disagree that the Making Best Use policy should be updated? What, if anything, would you like to be considered in any update to the Making Best Use policy?

9.1. Whilst the Making Best Use (MBU) policy excludes Heathrow Airport, pragmatically, it should apply to all airfields, including Heathrow. The MBU approach to aviation should apply across the UK, as the underlying principle should be to secure efficiencies in capacity and use of constrained airspace, with an aim of maximising existing capacity whilst managing environmental impacts. This is particularly important in the already congested airspace in the Southeast of England; by applying the MBU approach here, the provision of new aviation infrastructure can be planned based on the need for essential new infrastructure. For example, under MBU policy, business aviation operations at Heathrow, whilst only representing a very small percentage (approximately 0.1% of movements in 2025 equivalent to 1 in every 1,200, based on UK Civil Aviation Authority data), could be accommodated within existing ATM allowances at the dedicated business aviation Airport at nearby Farnborough.

10. To what extent do you agree or disagree that the draft HENPS provides an effective framework for decision making on development consent applications?

10.1. The HENPS covers an expanse of issues, setting out assessment principles and subsequently, how impacts will be assessed through the DCO process. However, as structured, it can be repetitive and requires much cross referencing between sections when looking at a particular issue. Moreover, sections 4 (Assessment principles) and sections 5 (Assessment of impacts) have similar, but not identical, headings. Therefore, in utilising the HENPS to inform the DCO decision-making process, there will be a tendency to focus on section 5, when section 4 also contains relevant contextual information but is difficult to refer to when applying the principles in section 5.

10.2. For example, paragraph 4.4, relating to the criteria that an applicant will need to meet, contains a bullet point that cross references to a long list of paragraphs in section 5 of the document which summarise the decision-making conditions relating to air quality, noise, climate change, and economic growth; similarly, paragraph 4.17, relating to the CNGI presumption, again cross refers to these paragraphs in section 5.

10.3. In this respect, consideration should be given to restructuring the document to align the headings in sections 4 and 5, or alternatively, merging the sections; the approach to informing decision-making on the four key tests would be much clearer and flow far better if the text which introduces, analyses and concludes on these matters (set out currently across sections 4 and 5) was presented together within the document.

10.4. In addition, as discussed above under the section relating to the mitigation of environmental impacts, much of the detail relating to the management of the control of growth at the Airport is to be determined through the DCO process, rather than being benchmarked clearly at the outset in the HENPS. This leaves areas of uncertainty whereby the DCO consenting process will be testing and establishing parameters that should have been set out in the national planning policy framework for Heathrow Airport that is to be provided by the HENPS.

11. Do you have any comments on any of the additional supporting documents, including the Appraisal of Sustainability (AoS), Habitats Regulations Assessment (HRA), Equality Impact Assessment (EqIA) and Health Impact Analysis (HIAn)?

11.1. This response aligns with the comments made by SCC and HSPG on the supporting documents. In relation to the Health Impact Analysis (HIAn), the assessment provides a strategic review of how the draft HENPS could affect health and wellbeing, including effects on vulnerable groups. It identifies potential health benefits from employment, income, skills, improved connectivity and opportunities for active travel, alongside potential adverse effects arising from aircraft and ground noise, air pollution, construction activity, surface-access traffic, community severance, displacement, loss of homes and

community facilities, reduced access to open space, and stress and anxiety associated with prolonged uncertainty and relocation.

11.2. The analysis also recognises that health effects may be experienced unequally. Children, older people, disabled people, people with existing physical or mental health conditions, lower-income households, socially isolated residents, airport and construction workers, and communities already experiencing deprivation or environmental burdens may be more susceptible to adverse effects or less able to realise the economic benefits. This is particularly relevant to communities close to Heathrow, including Stanwell and Stanwell Moor, where existing health inequalities and cumulative exposure to airport-related noise, poor air quality and road traffic must be fully reflected in subsequent assessment.

11.3. It is suggested that the HENPS should establish clearer requirements for the project-level Health Impact Assessment at DCO stage. This should assess construction, phased operation and full capacity; evaluate cumulative and in-combination effects, particularly the combined health burden of noise and air pollution; identify distributional effects at neighbourhood level; and demonstrate that mitigation is designed in from the outset rather than relying primarily on compensation after harm has occurred.

11.4. The HIAn is a useful starting point, but the draft HENPS should provide a more explicit and enforceable framework to ensure that expansion does not widen existing health inequalities or leave unacceptable residual effects on local communities.

12. The Public Sector Equality Duty (PSED) requires public bodies to consider the needs of people in relation to characteristics protected by the Equality Act 2010. Development applications must demonstrate due consideration for the PSED and wider obligations under the Act. Do you agree that the draft HENPS takes due regard for its legal obligations under the PSED?

12.1. The comments made by SCC in response to this consultation question, particularly in respect of protections required for the most affected communities in Stanwell and Stanwell Moor is aligned with this response.

13. What, if any, additional comments do you have on the draft HENPS?

Northwest Runway scheme

13.1. The HENPS is predicated on the principle of a north-west runway scheme; this is effectively pre-determined in the HENPS, based on work previously undertaken which assessed proposed Heathrow expansion schemes, and to this end, the HENPS includes a dedicated chapter on the Heathrow Airport Limited's (HAL) proposals. There is however an element of uncertainty in paragraph 1.9 whereby the HENPS applies to applications for development consent that cover a northwest runway with a length of

***up to** 3,500m* and forming *part of a scheme which, on completion, is capable of enabling at least 260,000 additional ATMs per annum.*

13.2. The wording contains a small element of flexibility that effectively allows a competing scheme to be proposed through the DCO process that would deliver a runway that is *less than* 3,500m. The HENPS is, however, not clear on how the process to consider more than one DCO application for a new runway and associated infrastructure would be managed concurrently.

13.3. Moreover, it is weighted in favour of the HAL scheme, which whilst reflective of Government support for the expansion of this scale and format, does make the HENPS less capable of enduring should, for any reason, the HAL proposals become delayed or unimplementable. Ideally, the HENPS should be focused on providing a framework for the key environmental and social impacts and economic considerations of expanding Heathrow, rather than expressing a preference already for a particular proposal.

Public Safety Zones

13.4. The HENPS does not mention specifically Public Safety Zones (PSZs). It alludes to safety matters in paragraph 4.5 and mentions in paragraph 4.6 that matters which are controlled by separate regulatory regimes *may (emphasis added)* be a material consideration where they have land use implications. Paragraph 4.21, relating to exceptional circumstances that may outweigh the CNGI presumption, includes reference to residual impacts remaining which present an unacceptable risk to, or unacceptable interference with **public safety**.

13.5. Paragraph 4.99 refers to matters of aviation safety. It mentions that the UK's civil aviation regime sets the requirements for the safe operation of aircraft, airports, and airspace, acknowledging that the applicant's scheme must fully comply with the UK's civil aviation regime.

13.6. The Aviation Policy Framework (APF, 2013) sets out the Government's policy objective on safety. It states that *'for people living and working near airports, safety is best assured by ensuring the safe operation of aircraft in flight. However, in areas where accidents are most likely to occur, we seek to control the number of people at risk through the public safety zone (PSZ) system. PSZs are areas of land at the ends of runways at the busiest airports, within which development is restricted. Our basic policy objective remains not to increase the number of people living, working or congregating in PSZs and, over time, to see the number reduced' (Paragraphs 5.14-5.15).*

13.7. Guidance on development in public safety zones (PSZs) is contained within DfT Circular 01/2010 'Control of Development in Airport Public Safety Zones'. The PSZ Policy set out within the APF and Circular 01/2010 focuses on circumstances where new development near existing airports is being considered. There is no formal national policy that deals explicitly with safety when a new airport, or *significant development at an existing*

airport, is proposed, although the general principles on which the PSZ Policy is based can be applied to a proposal to establish *or expand* an airport. Such proposals fall to be considered within the context of the planning system. This requires that where a development causes 'demonstrable harm', the benefits associated with it would need to outweigh that harm if it is to be permitted.

13.8. The Civil Aviation Authority regulates aviation activity in the UK to ensure the maximum safety of aircraft and the persons and property carried therein. Whilst the Department for Transport is responsible for PSZ policy, the Civil Aviation Authority (CAA) has administrative responsibility for implementing PSZs.

13.9. Whilst the HENPS is clear that an applicant would need to meet the UK's civil aviation safety regime, there is no mention of the fact that modelling of the proposed increase in annual ATMs, from 480,00 to 756,000 would need to be undertaken to establish the change over time in the extent of PSZs at either end of the runways, including the new runway. Noting that the policy objective in the APF remains not to increase the number of people living, working or congregating in PSZs and, over time, to see the number reduced, it is not clear in the HENPS where this analysis will take place and how the information will be presented through the DCO consenting process.

13.10. The HENPS should be more explicit in this respect, particularly given that the PSZ Policy approach requires an assessment in the planning balance of the harms that might arise in respect of public safety against the benefits associated with the development. In addition, there needs to be certainty that future increases in ATMs will not result in an increase in people living, working, or congregating in PSZs; and if this reassurance cannot be offered, the CPZ zone should be extended to include affected properties.

Appendix A: Heathrow Expansion National Policy Statement consultation document: detailed comments from Spelthorne Borough Council

Page	Paragraph Number	HENPS text in black: Spelthorne comments in blue
8	1.10 & 1.11	'The Government recognises that the Heathrow Northwest Runway scheme currently promoted by Heathrow Airport Limited, and which has informed this NPS, is not limited to the construction of a new runway and associated new terminal infrastructure. It also includes the modernisation, reconfiguration and integration of existing terminal and airport infrastructure required to enable the airport to operate effectively as an expanded and integrated whole. As a result, the scheme now envisaged is of substantial scale and complexity, both in its physical extent and in the way it would need to be delivered while maintaining the continued operation of Heathrow Airport.' 'The Government expects any application brought forward under this NPS ultimately to provide for a complete Northwest Runway scheme, including the runway, terminal capacity and other supporting infrastructure required for the scheme to operate as an integrated whole. However, given the scale, complexity and likely delivery timeframe of a scheme of this kind, the Government recognises that it may be appropriate for such a scheme to be brought forward and delivered in phases. A phased scheme which enables, and does not hinder, the delivery of the completed scheme as a whole is capable of being compliant with this NPS. Where a phased approach is proposed, the application should clearly identify the content and sequencing of each phase, including how runway, terminal and other supporting infrastructure will be coordinated and integrated over time. Any such approach must demonstrate a clear, coherent and deliverable pathway to the completed scheme as a whole and cannot comprise a runway or terminal in isolation.' The text is recognising the complexity and the integrated nature of an expanded Heathrow and the need for phased delivery of such expansion. This should be reflected in the applicant's approach rather than relying on 2018 assessment methodologies.

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		1.10 Refers to the development being delivered while maintaining the continued operation of Heathrow Airport. This is very important from an air quality perspective because it means that on top of the usual Heathrow related traffic there will also be construction traffic. Scenarios where both aspects of traffic are being included in air quality modelling for the phases mentioned in the NPS should reasonably be expected.
	1.16	'This identification is made for the specific and limited purpose of providing clarity in relation to statutory blight provisions, and to provide clarity for local communities and for consultation purposes on preparatory work for DCO applications. In accordance with section 169 of the Town and Country Planning Act 1990, Heathrow Airport Limited will, where relevant, be the appropriate authority for the purposes of statutory blight arising in connection with such development associated with expansion. ' Paragraph 1.16 refers to statutory blight, and the Heathrow Airport Ltd will where relevant be the appropriate authority concerning this in relation to expansion. This could have done with clarification as to whether blight includes blight from nuisance or is referring exclusively to land blight as per Chapter 4. The concern is that the applicant could be enforcing upon itself. No information is given on what statutory blight arrangements would be. This will be very concerning to residents. Paragraph 1.29 in reference to the appraisal of sustainability lists a number of areas of significant adverse environmental effects and significant adverse effects at the local scale for communities and quality of life. In that context it is a further disappointment that statutory blight during construction has not been considered as a priority and that as detailed below Making Best Use policy does not apply. If it must be the case that the applicant will be the appropriate authority for statutory blight then they should be required to regularly publicly report anonymised statistics on what complaints they have received and how they have been resolved/addressed/mitigated, and there would need to be the equivalent of an ombudsman that residents could go to where complaints were not resolved, otherwise there is no guarantee of accountability.
11	1.23	'Making Best Use (MBU) policy published in June 2018 sets out the policy framework for airports seeking to make best use of existing runways beyond Heathrow. MBU does not apply to development at Heathrow. The Government continues to consider MBU to be relevant and important

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		for all UK airports outside of Heathrow and will consider updating MBU to ensure it reflects the latest data, policy and legislation.' Paragraph 1.23 excluding Heathrow from the making best use policy is disappointing. Expansion should not mean that from an environmental perspective there is no obligation to make best use of existing runways at alternative Airports.
13	1.32	'The strategic-level Habitats Regulations Assessment, conducted in accordance with the Conservation of Habitats and Species Regulations 2017, concluded that it is not possible to rule out adverse effects of the Heathrow Northwest Runway scheme, given that more detailed project design information, and detailed proposals for mitigation, are not presently available. Considering this, a derogations assessment has been applied that concludes that there are no feasible alternatives to deliver the objectives of the Heathrow Expansion NPS that would have less impact on Habitats sites, and that it is possible, at the DCO stage, following the development of mitigation measures, detailed design, and further investigation/modelling that a conclusion of no adverse effects on integrity could be drawn. It also concludes that there are sufficient options available to a developer that effective compensation for adverse effects on integrity should be possible, if necessary.' Paragraph 1.32 refers to strategic level habitats regulation assessment and the likelihood of adverse effects. This will have impacts upon the ability of neighbouring local authorities to deliver the local plans concerning housing for example as there is a risk that the 3rd runway development uses up any headroom in terms of habitats impacts (for example concerning changes in traffic emissions and air quality impacts upon sensitive habitats). This potential impact on housing provision should be considered within the economic and community assessments that inform the HENPS.
12	1.29	'The conclusions of the Appraisal of Sustainability for this NPS identify significant beneficial effects for the local economy during operation of the airport, reflecting increased airport capacity, improved connectivity and the generation of employment. At the national level, economic effects are found to be uncertain as a proportion of activity may reflect changes in where economic activity takes place rather than wholly additional growth. The appraisal identifies significant adverse environmental effects in the following areas: air quality; biodiversity; climate change in relation to adaptation and

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		mitigation; historic environment; landscape; noise; resources and waste; soil; and water. For communities and quality of life the appraisal identifies significant adverse effects at the local scale and significant beneficial effects at a wider scale resulting in mixed effects overall for communities. The strategic-level Appraisal of Sustainability does not pre-judge the outcome of future development consent decisions, nor does it replace the need for project-level assessment. Instead, scheme-level evidence is used to inform conclusions on the likely sustainability implications of this NPS, recognising that detailed design, mitigation and regulatory control will influence the final outcomes.' The health implications of in combination effects such as the combination of air quality and noise impacts together upon a population, and the associated economic impacts with regard to health costs and determinants should be taken into account when considering sustainability.
14	1.40	'In order to be compliant with this NPS, a further project level Health Impact Assessment is required. The application should include and propose health mitigation and monitoring, which seeks to maximise the health benefits of the scheme and takes all reasonable steps possible to mitigate any negative health impacts.' Paragraph 1.40 refers to health impact assessment and mitigation monitoring seeking to maximise the health benefits of the scheme and to take all reasonable steps possible to mitigate any negative health impacts. It is not possible to mitigate negative health impacts that have arisen from a reduction in air quality. Air quality impacts on people occur from before they are born right through to the end of their life. Mitigation by design is the only way to reduce these impacts. Airport and airport related industry workers through increased exposure, and their families by virtue of being more likely to live closer to the airport, may be particularly vulnerable to these impacts and yet there is no reference to that consideration in this document.
23	2.35	'The detrimental effect of disruption was seen in 2025 when a fire occurred at a High Voltage electricity substation causing power loss at Heathrow Airport. Significant disruption was experienced by approximately 200,000 passengers. While the incident would not have been solved by increased capacity, it did highlight the constraints Heathrow Airport faces operating at full capacity, including limited operational windows to carry out works to improve resilience or upgrade assets, as well as the

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		challenges of operating within a highly constrained footprint40, and the reduced ability to clear backlogs once the airport reopens.' Paragraph 2.35 is linking runway capacity to incident resolution and recovery. The nature of the airport which is effectively an island surrounded by perimeter and strategic roads that is accessible via a tunnel already has challenges in terms of routing power and fuel and other services in and out. Fuel storage for strategic aviation fuel and the need to be able to pipe it across the campus, and how to integrate capacity for renewables, need to be considered in any expansion plans. The plans do not appear to address this and will introduce a further runway that has the same resilience issues as the existing ones.
29	3.16	'The limitations on the evidence provided on noise impacts of each scheme necessarily limited the ability to consider the merits of either scheme proposal on this basis.' There is also a limitation on information in the public domain at this stage with regard impacts from airspace change both at Heathrow and nationally. It is quite possible that delays in that policy are leading to delays in impact assessment for noise impacts in relation to the expansion. It is imperative that the impacts of expansion combined with the impact of airspace change is assessed not only for noise but also for air quality and in relation to climate change and greenhouse gas emissions.
35 & 48	4.15 & 4.83	'The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction, carbon emissions and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate those regulatory regimes.' 'Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality or the marine environment, or which include noise, may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes. Relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated.'

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		It should be recognised that expansion of Heathrow will place an additional regulatory burden on authorities in terms of pollution control. There are regulators such as the Environment Agency involved in regulating Heathrow and affiliated businesses/industries that have response times to reach the Heathrow area that correspond with the distribution of office locations with the closest being a considerable distance away in central London, Reading, Hatfield and Wallingford.
37	4.24	'The applicant must clearly demonstrate how they have met the requirements in this NPS, met the four tests and relevant legal requirements, and that they have applied the mitigation hierarchy. Any residual impacts that remain should be clearly defined and the harm articulated. Applicants should also seek the advice of the appropriate Statutory Nature Conservation Body (SNCB) or other relevant statutory body when undertaking this process.' Paragraph 4.24 refers to residual impacts that should be clearly defined and the harm articulated. It is possible that there will be residual impacts concerning air-quality and health that should be fully considered.
39	4.40 & 4.41	'When considering significant cumulative effects, any Environmental Statement should provide information on how the effects of an applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, proposed projects whose consent is yet to be determined, as well as those already in existence if they are not part of the baseline)' 'The Examining Authority should consider how significant cumulative effects, and the interrelationship between effects, might as a whole affect the environment, even though they may be acceptable when considered on an individual basis or with mitigation measures in place.' In combination effects should also include the impact on health from the combined impact of noise and air quality together. For example, there are cardiovascular health implications.
40	4.44, 4.45, 4.46	Staines Moor and the reservoir habitats close to Heathrow within Spelthorne have not only unique biodiversity but are also valuable green spaces that support local residents' health and are part of the regional park. Expansion at Heathrow does not justify damage to what is a very important part of the

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		local area as well as a habitat which supports migratory birds which both attracts visitors to the area to view them and that enjoyed by local people but also has an irreplaceable function in migration that will have impacts far beyond the local area should that habitat be damaged by noise and air quality impacts. These habitats are already subject to risk due to the close proximity of the M25 motorway. Tests regarding public interest should take into account these factors and not just economic benefits of expansion. There are features such as the ancient anthills on Staines Moor that cannot be mitigated for through net gain approaches.
42	4.51	Paragraph 4.51 of the NPS (p.42) sets out that the Secretary of State will be the "discharging authority for an updated biodiversity gain plan or phase biodiversity gain plans […] in consultation with host local planning authorities". Whilst it is recognised that NSIPs are signed off by the SoS, it is unclear how much say host LPAs will have in the approval of BGPs and/or HMMPs or who will be responsible for monitoring implementation and taking enforcement action should the BGP/HMMP not be adhered to. Clarity on this point should be provided. This is mostly covered in section 5 of the HSPG response already, but specifics of enforcement are not as clear as could be. Additionally, while this is an early stage, we would like to see a commitment from the developers that all BNG will be delivered on-site or, if this is not feasible, that off-site gains would be delivered in the local area. Given the scale of this development, it would be unacceptable for BNG to be delivered via statutory credits as this would not ensure BNG mitigation or compensatory habitats would have to be provided within the areas impacted by the development. See also section on NRF below.
42 – 43	4.52 – 4.55	The strengthened emphasis on good design, independent design review and the NISTA design principles is welcomed. However, concerns raised through the 2018 ANPS process and the 2025 EIA consultation regarding the absence of a clear masterplan-led approach and meaningful local authority involvement remain unresolved. The HENPS should require affected local authorities to participate formally in design review processes and require applicants to demonstrate how design responds to local character, community identity, landscape setting, Green Belt context and wider placemaking objectives. Design should be used proactively to avoid impacts rather than relying on mitigation after impacts have been identified.

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		The HENPS should require a design-led approach consistent with locally adopted design codes and the National Model Design Code. Applicants should demonstrate how options appraisal has considered alternative layouts, infrastructure locations and land use strategies to minimise impacts on communities, open space, Green Belt, heritage assets and landscape character, and how local design guidance has informed scheme evolution from the outset.
44	4.61	'In assessing the implications of expansion, analysis undertaken for the purposes of this NPS has highlighted the importance of affordability to the successful delivery of expansion at Heathrow. Where the costs of expansion lead to airport charges at Heathrow that, if passed through to passengers, would result in passenger charges being higher than is consistent with the scheme delivering appropriate net benefits, there is a risk that passenger demand for services at Heathrow could be adversely affected. This could reduce the effective utilisation of new capacity and weaken the extent to which the strategic objectives of expansion are realised.' This reads that an objective of expansion of Heathrow is attracting more passengers for economic benefit. 4.62 refers to a London airport system demand, this is not something that we have had access to assessment of. Would a systems approach not be important in justifying why Heathrow must expand to the extent proposed. There will be combined impact of some elements of that system, for example cumulative ultrafine particulate emissions.
49	Section 4.88	'The effects of existing sources of pollution in and around the project are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits.' SBC will expect that other sources of pollution including those related to regulated sites such as waste gasifiers, will be taken into account within the assessment of cumulative effects. The West London Waste Plan should be considered in this context. The cumulative impact of combined noise and air quality effects should be assessed.
49 & 125	Section 4.90, 4.91, 4.92 & 5.333	'Section 158 of the Planning Act 2008 provides a defence of statutory authority in civil or criminal proceedings for nuisance. Such a defence is also available in respect of anything else authorised by an order granting development consent. The defence does not extinguish the local authority's duties

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		under Part III of the Environmental Protection Act 1990 to inspect its area and take reasonable steps to investigate complaints of statutory nuisance and to serve an abatement notice where satisfied of its existence, likely occurrence or recurrence.' 'During the examination of an application for development consent for infrastructure covered under the Heathrow Expansion NPS, possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990 and under sections 76 and 77 of the Civil Aviation Act 1982 should be considered by the Examining Authority. Nuisance can include emissions such as dust, odour, artificial light, smoke and steam. The Examining Authority should also consider how those sources of nuisance might be mitigated or limited so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent.' 'The defence of statutory authority is subject to any contrary provision made by the Secretary of State in any particular case by an order granting development consent. The defence conferred by statutory authorisation is not intended to extend to proceedings where the matter is "prejudicial to health" and not a nuisance. When considering whether to include exceptions to the defence in an order granting development consent (section 158(3) of the Planning Act 2008), the Secretary of State should have regard to whether any nuisance is an inevitable consequence of the development.' 'For nationally significant infrastructure projects of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. Impacts should be kept to a minimum and should be at a level that is acceptable.' SBC would strongly advocate for statutory nuisance laws being fully applicable to the development. This is the best way to ensure the applicant undertakes mitigation through not only design where possible but also as an operational facility via policy throughout the operational lifetime of the airport to monitor what nuisance they may be causing, and to take actions to address and mitigate nuisance such as odour from fuel for example. There is a need for this to be

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		undertaken on an ongoing basis for many different reasons including that operations will undoubtedly change over time from what is proposed in the planning process, that technologies will change in relation to how the airport operates but also in relation to mitigation. If there is an exemption in place the statutory nuisance through the defence of statutory authorisation for evermore that leaves no recourse for residents who will have to endure a lengthy construction process during which statutory nuisance should apply and will be faced with a far larger Heathrow that has the potential to generate further nuisance. It should be noted in relation to dust that there is no safe level of particulate matter pollution to be exposed to and therefore the wording of acceptable levels is not relevant.
51	4.99	'Air transport remains one of the safest modes of travel globally, and the UK continues to uphold its reputation as a world leader in aviation safety. Maintaining and strengthening these high standards, while ensuring that safety regulation is proportionate, evidence-based, and cost-effective, remains of primary importance to the UK. This work is supported by close collaboration with international aviation safety partners to promote consistent global standards. The UK's civil aviation safety regime, established in domestic legislation and shaped by international obligations, sets the requirements for the safe operation of aircraft, airports, and airspace, providing the framework through which risks are managed, operators are certified, and compliance is assured through rigorous oversight. Accordingly, the applicant's scheme must fully comply with the UK's civil aviation safety regime, overseen by the Civil Aviation Authority.' Reducing health impacts in relation to aviation needs to be seen as part of safety, such as occupational safety but also the safety of passengers and the safety of communities around airports. Research is starting to show that some aircraft maintenance factors such as lubrication have an impact on ultrafine particulate generation, and it is important that national policy does not just reinforce the status quo and allows for technological developments to generate improvements in emissions via a safety positive approach.
51	4.101	'New or enhanced infrastructure covered by this NPS may also have indirect health effects, for example if they affect access to key public services, local transport, opportunities for active travel, or

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		the use of open space for recreation and physical activity. It should also be noted, however, that beneficial health impacts may be expected from employment and income generation, and education, skills and training opportunities.' Health impacts are likely to be different in different groups of the population for example elderly residents are less likely to benefit from the employment opportunities education skills and training as a positive impact. Disparities in the health impacts on different demographic groups need to be considered. The effects of poor air quality and noise upon health are known to be most acute in less economically advantaged communities the approach in the paragraph above is quite simplistic and risks not identifying these disparities and mitigating for them.
52	4.103 & 4.104	'The applicant should identify measures to avoid, reduce or compensate for adverse health effects as appropriate and proportionate. The effects on people may occur simultaneously, so the applicant, the Examining Authority and the Secretary of State (in determining an application for development consent) should consider the cumulative effects on health, including how airport activities influence the broader quality of life experienced by local communities, and the ability of monitoring to recognise unforeseen significant health effects and the effectiveness of mitigation measures.' How will health monitoring of the impacts of expansion be secured? Through what channels will this monitoring and reporting take place? These questions should be covered by the Health Impact Assessment.
52 & 82	4.105 to 4.107 7 5.107 & 5.108	'The Government is committed to a more accessible and inclusive transport network. This applies to any new infrastructure covered by this NPS, and should support disabled people and others with reduced mobility to travel with dignity and ease throughout their whole journey.' Will the '*others with reduced mobility'* include a consideration of protected characteristic groups and how young children's needs in terms of mobility will be accommodated so that families can utilise public transport easily. There is little mention of the needs of children, young persons and the elderly in this whole document yet they are passengers that access Heathrow, and families living and working around Heathrow need to utilise transport to access nurseries and schools, medical

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		facilities etc. Navigating the road network on foot with young children is already extremely difficult around Heathrow and the needs of these groups should be considered in policy. Disabled parents and carers face particular challenges in accessing transport with young children and disabled children are a group with their own distinct needs.
53 – 54		The inclusion of a dedicated placemaking section is welcomed and represents a significant improvement on the 2018 ANPS. However, the policy remains primarily focused on mitigating impacts rather than creating successful places. Heathrow expansion should contribute positively to local regeneration, town centres, community infrastructure, active travel networks and environmental quality. Applicants should demonstrate how proposals align with adopted Local Plans and wider place-shaping aspirations across the Heathrow functional economic area. The HENPS should recognise that affected authorities are currently planning for significant housing, employment and town centre growth. The adopted Local Plan and emerging evidence identify significant housing, employment and infrastructure requirements. Airport expansion should support delivery of these objectives and demonstrate how proposals contribute to regeneration, infrastructure provision and sustainable growth rather than creating additional constraints. The HENPS should require preparation of a Strategic Placemaking Framework, developed jointly with affected local authorities, to guide delivery of community facilities, open space, active travel, landscape enhancement, green infrastructure and regeneration opportunities arising from expansion. Healthy placemaking should be more strongly embedded throughout the HENPS. Expansion proposals should demonstrate how they support access to open space, recreation, green infrastructure, active travel, community wellbeing and social cohesion, particularly in communities most affected by airport-related development. ‘The land and surrounding development required to deliver the Northwest Runway, and any associated infrastructure, will directly impact neighbouring local authorities in the area. Delivering the

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	4.110	scheme will give rise to residential displacement and loss of housing, loss of community facilities and assets across the wider area, including schools, nurseries, places of worship, recreational spaces and local businesses. Alongside this there are likely to be indirect effects on access to services, social networks community cohesion and overall quality of life. It is therefore important that any scheme put forward by an applicant has been developed with any local authorities impacted by the land take required by the development to minimise these impacts where possible. This should include engagement with local authorities on the local needs of the area.' Consideration should be given to making sure that any replacement facilities are accessible by public transport and on foot and not exclusively by car. The expansion should take account of providing mitigation for any severance of communities such as the need for footbridges and foot/cycle paths to retain and enhance links. The expansion presents an opportunity to improve links with neighbouring communities and between them including the provision of new public transport routes or shorter routes within the local area.
55/56	5.4 & 5.5	With regard to air quality the UK NO_2 annual standard when set 25 years ago was the same as the WHO and EU standards at 40µg m^{-3}. Science has moved on considerably since then such that the EU standard is now half that of the UK at 20 µg m^{-3} and WHO guideline is 10 µg m^{-3}. The Governments test of meeting the UKs AQ obligations should be strengthened to say it should meet the WHO or at least European AQ standards.
56/ 57	5.5 & 5.9	Detailed analysis for the applicant's ES should include full detailed modelling for NO_x/NO_2, PM_{10} and $PM_{2.5}$ at receptor locations, the dispersion of $PM_{2.5}$ and PM_{10} in a local environment has a lot of subtleties to it, so having few modelling points based on relatively open locations and background locations where monitors are situated won't capture the range of potential concentrations that could be expected in the wider area. Topography and appropriate surface roughness is important and should be included in all modelling. There needs to be a modelled base year (an up-to-date year such as 2025), then modelled concentrations at the opening of project with and without development, modelled concentrations at

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		max capacity, and also at appropriate milestones between opening and max capacity with and without development. Full source apportionment at modelled points around and beyond the airport is needed to support Local Air Quality Management. Given the focus on accommodating larger aircraft there should be consideration of this in the modelling, including emissions when under taxi manoeuvres, on stand and any differences in take-off and landing procedures that could impact emissions of air pollutants. Any differences to engine testing facilities to accommodate these aircraft should also be factored in.
58	5.11	'The applicant should undertake an assessment of the project as part of the Environmental Impact Assessment, of where its impacts (both within and outside the site boundary) are likely to have a significant effect on air quality in compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, or affect the UK's ability to comply with statutory air quality limits, objectives and targets.' 5.11 refers to significant effect; need to model comprehensively to determine where such effects might occur. The screening approach needs to be outlined to scope in relevant sources.
58	5.12	'5.12 The Environmental Statement should assess: • Existing air quality emissions and concentrations; • Forecasts of emissions and concentrations of all relevant air quality pollutants at the time of opening, (a) assuming that the scheme is not built (the 'future baseline'), and (b) taking account of the impact of the scheme, including when at full capacity; • Current evidence and assessment in relation to the impact of UFPs; • Any likely significant air quality effects of the scheme, their mitigation and any residual likely effects, distinguishing between those applicable to the construction and operation of the scheme and taking account of the impact of any road traffic generated by the project; • The modelled emissions, concentration change and absolute concentrations of the proposed project after mitigation methods have been applied; • Any potential impacts on nearby designated habitats from air pollutants;

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		• The proximity and nature of nearby receptors which could be impacted, including those more sensitive to poor air quality; and • Any cumulative effects in respect of air quality including in respect of health.' There will be stages of the phased development that should also be assessed, the scenarios proposed do not adequately consider years where construction traffic/plant will be present alongside operational stages of the development and existing airport operations which will continue. There will be a potential combined impact in earlier years than the year of fully built out scheme opening, that should also be assessed. This will be important for human health and for habitats.
58	5.14	'Defra publishes estimates of historic emissions and future projections of UK air pollutant emissions. Estimates are updated annually reflecting changes in the evidence and are the basis for national concentration modelling. The applicant's assessment should use the latest available data and be consistent with Defra's approach and may include more detailed local modelling to demonstrate local impacts.' The detailed local modelling needs to demonstrate local impacts as a must rather than an optional 'may'.
59	5.21	'In respect of the provision of surface access to the Northwest Runway scheme, the applicant must set out and regularly review its plans to meet the mode share targets set out in the Surface Access section of this NPS. The Secretary of State, when considering any application for development consent, would also expect to see evidence that the following measures to mitigate the air quality impacts of surface access have been considered: *A surface access strategy that incentivises mode shift to public transport and active travel, and prioritises environmental sustainability, in line with the requirements set out in the Surface Access section of this NPS;* *• Zero- or low-emission hybrid or electric vehicle charging and fuel facilities including for coaches, buses, taxis, private hire vehicles and heavy goods vehicles;* *• Changes to the layout of surface access arrangements;*

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		• *Traffic restrictions and / or traffic relocation around sensitive areas, including speed control on roads;* • *An emissions-based access charge with higher charges for vehicles that produce more emissions (both tailpipe and non-tailpipe);* • *A strategy for the minimisation of air quality impacts from road freight; and* • *Physical means, including barriers to trap or better disperse emissions.* Any proposal for barriers should be modelled to demonstrate that they are effective and have an adequate monitoring plan to ensure they perform as expected. Speed controls should be modelled and sensitivity tested to ensure the correct limits are applied for the predicted mix of fleet as different vehicle categories respond to different optimum speeds in terms of emissions.
60	5.23	'Mitigation measures at the construction stage must draw on best practice from other major construction schemes, including during the procurement of contractors to minimise air quality impacts. The Secretary of State, when considering any application for development consent, would expect to see evidence that the following measures to mitigate the air quality impacts of construction operations have been considered: • Development of a construction traffic management plan (which may include the possible use of rail and consolidation sites); • The use of low emission construction plant / fleet, fitting of diesel particulate filters, and use of cleaner engines; • The use of freight consolidation sites; • Active workforce management / a worker transport scheme; • Construction site connection to grid electricity to avoid use of mobile generation; and • Selection of construction material to minimise distance of transport and increase recycling percentages of the material where appropriate.' Measures should also include mains water sourced dust suppression and where there are neighbouring receptors who could be sensitive to dust impacts, suitable construction site monitoring equipment, and dust management plan to include visual inspection and measures to prevent dust

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		moving offsite. This should reflect the Institute of Air Quality Management best practice guidance on air quality and construction. This is important not only for human health but for safety when working near an airfield and major motorway for visibility and accident prevention (impacts upon friction on runways etc). Solid site hoarding should be utilised, not Heras fencing as that provides no barrier to dust moving offsite.
62	5.28	'As part of the application of this test the Secretary of State will consider air quality impacts over the wider area likely to be affected, as well as in the vicinity of the scheme. This should be considered in the context of Local Air Quality Management (LAQM) duties placed on local authorities under the Environment Act 1995. Proposals of this scale may place significant additional demands on local authorities responsible for monitoring, assessment and delivery of local air quality improvements. Applicants should therefore demonstrate how they will support effective local implementation of mitigation, including alignment with existing Air Quality Action Plans and minimising additional burdens on local authority resources.' Additional monitoring capabilities and resource to analyse that data will be required on a long-term basis by local authorities both during construction and operation of the scheme. Source apportionment is important; it is concerning that it was not included. It is key to Local Air Quality Management; no local authority will be able to afford to model, and source apportion for an Airport this size themselves.
Chapter 5 General Comments	Chapter 5 General Comments	There is no mention of utilisation of appropriate traffic data and modelling methodologies related to queuing traffic. The approach of using AADT traffic for modelling will be a generalisation and will not give the granularity for peak hours that utilising period traffic data would give. Peak times for traffic accessing the airport may differ from peak times for through traffic and freight traffic, during the construction phases there will be impacts that do align with peak local/through traffic potentially with additional congestion to consider in modelling. There is no mention of mitigation through junction design, i.e., bus priority signalling, or dynamic signalling designed to reduce queue lengths/ maintain optimum vehicle speeds for more polluting vehicles.

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		Nothing is specifically mentioned about the very large car park that is proposed to the south of the airport, its role in facilitating expansion/the need for it in that location or how access to that will be managed, and when peak demand will be or how that should be incorporated into modelling; this needs to be designed and managed to minimise air quality impacts. Note 4, on page 8 refers to accommodation of the largest commercial aircraft to support long haul flights that support the U.K.'s position as a major aviation hub. The air quality modelling is going to need to reflect a realistic portion of these aircraft and to some extent to make predictions about that going into the future. A profile of larger aircraft will have different emissions implications to that of smaller aircraft. There may also be some implications for how realistic it is to rely on sustainable aviation fuel as mitigation for ultrafine particulates as if the focus will be on providing long haul capacity there will be many emerging and developing economy destinations that will not be able to support providing that fuel.
84	5.122	'Any changes to the strategic road network which the applicant proposes should be implemented consistently with the Secretary of State's statutory directions and guidance set out in National Highways' licence. This includes ensuring that there is sufficient flexibility to adapt to any future changes to the long-term development, improvement and operation of National Highways' network, such as Autonomous Vehicles' The impact of any proposed changes to the strategic road network on air quality, noise, greenhouse gas emissions and health should be fully assessed. Where procedures such as webTAG apply to optioneering there will need to be additional consideration of cumulative impacts as a result of the wider scheme of expansion.
86	5.129	'The Government considers that enhanced rail connectivity is necessary for supporting expansion at Heathrow and to achieving the public transport mode share targets associated with it. This may include improvements that provide better connectivity from the west and/or south of the airport and enable more direct and convenient journeys for passengers and staff. However, the Government does not consider that all such rail enhancements must necessarily be comprised within the DCO

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		application for the Northwest Runway scheme in order for development consent to be granted. What is required is that the applicant demonstrates clearly in their surface access strategy the rail enhancements they are proposing to deliver and a credible plan for their delivery, how mode share targets will be achieved, how any such enhancements relate to the proposed expansion, its phased delivery and how they would be secured to form part of a wider, credible and deliverable plan for surface access to an expanded Heathrow.' The expansion of London transport zone 6 to include railway stations in Spelthorne should be considered. There are areas that are geographically further out from central London that are already included under the oyster pricing structure scheme. This could be a potential mitigation towards expansion as some passengers heading to Heathrow do route through railway stations in Spelthorne. This would also have benefits for the local community economically and improve access to employment in London by removing a cost barrier.
87	5.132	'In order to deliver the expected benefits for air freight from additional flights at Heathrow, the applicant should demonstrate a plan to increase the airport's cargo capacity that addresses the limitations in cargo handling that exist at the existing site. This should set out the location and size of new cargo handling and processing facilities and the access routes to the road network.' These facilities and the associated traffic should be included within the environmental assessments and health assessments. The impact of the facilities on the local road network should be assessed, and measures should be considered where appropriate to make sure that vehicles route via the strategic road network to reduce the impact on local residents. Hours of operation in relation to the hours of operation of the expanded airport should be fully explained and assessed. It should be recognised that the staff required for such operations often travel to work by car due to the shift patterns and that this puts traffic onto local roads, mitigation should be in place to make sure that there are public transport and active travel options available to these workers.
87 & 98	5.135 & 5.187	'A detailed construction management plan is required to support an application for development consent. The promoter's approach to construction should be designed to avoid, reduce and mitigate adverse effects on the strategic and local road network, existing surface access arrangements, and the

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		safe and efficient operation of Heathrow Airport. The plan should set out how construction traffic, workforce travel, plant, materials, spoil and waste will be managed and phased so as to minimise disruption to passengers, airport workers, freight operators, local communities and other network users. It should include measures to reduce congestion, maintain access, protect road safety and limit impacts on local communities and journeys, including through construction traffic routing, timing of movements, consolidation of deliveries, and the use of rail or other sustainable modes for the transport of materials where feasible. The plan should also set out arrangements for monitoring transport impacts during construction and for implementing corrective action where impacts exceed those anticipated.' 'Development of land can affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process. During the development lifecycle, soil should be sustainably managed and handled appropriately, reusing soil to keep it on site where possible, and reducing the amount sent to landfill. Any land affected by contamination will need to be remediated appropriately.' Construction management plans need to include detailed environmental management plans and these where appropriate need to consider where works are taking place on land that may have been subject to historic uses that could give rise to land contamination. Materials recovery and reuse needs to take this into account with appropriate measures in place to test soils to ensure they are suitable for re-use and to prevent cross contamination on site. There should be a commitment to ensure that work fronts are supervised adequately with regard to potential land contamination being identified and investigated for example under the SILC accreditation scheme Welcome to SiLC | Specialist in Land Condition Register Ltd (SiLC) or a National Quality Mark Scheme Suitably Qualified Person. Measures should be a place to make sure that dust generated during any works with surface soils is sufficiently suppressed and does not present a hazard from track outlaw release when it is being transported.

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		There should be an approach that ensures that land affected by contamination is identified appropriately assessed including through site investigation before any material is reused from such land and that ensures that remediation is proposed to scrutinise by an appropriate professional and undertaken then validated in accordance with government guidance see LCRM. Wording within the DCO should reflect the requirements of LCRM in full. https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm
89 – 90	5.144 – 5.149	The recognition of domestic connectivity is welcomed. However, greater clarity is needed regarding how connectivity benefits will be secured, measured and distributed. The HENPS should require monitoring and reporting of economic outcomes generated by domestic connectivity and demonstrate how benefits support economic growth across UK regions. Domestic connectivity should not be considered solely in aviation terms. Previous concerns regarding uncertainty surrounding Western Rail Access, Southern Rail Access and wider public transport integration remain unresolved. The HENPS should require airport growth to be supported by strategic rail, public transport and active travel improvements that strengthen access to employment and economic opportunity across the Heathrow functional economic area.
90	5.152	Section 5.152 (p.90) recognises that biodiversity encompasses, amongst other things, the genetic diversity of a species. Section 5.162 (p.92) mentions the possibility of new tree planting. The applicant should consider measures to ensure genetic diversity of any trees removed is conserved by utilising measures such as seed or material propagation from trees earmarked to be lost, or other local sources, rather than planting trees obtained from commercial sources. Additionally, old and local trees will provide climate resilience. Tree planting is only ever valuable, with robust and adhered to, maintenance, monitoring and long-term management – not a good bank for BNG due to low survival rate due to improper aftercare and condition assessments, species chosen and planted, no adherence to the wider landscape / design approach / habitat connectivity.
93	5.163	Section 5.163 mentions the possibility of contributing to the Nature Restoration Fund (NRF) to offset loss or damage to protected species or features. Unless such NRF funding could be guaranteed to be spent in the areas impacted by the HENPS development, attempts to mitigate for damage to protected

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		species and features should be resisted given that the start point is loss or damage to protected species or features, and this should be avoided unless local mitigation can be provided.
95	5.176	Paragraph 5.176 sets out that the SoS "will ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable. Where necessary, requirements and/or planning obligations should be used to ensure these proposals are delivered". As above, such decisions should be made in consultation with LPAs impacted by the development, and a clear delineation of responsibility for monitoring and enforcement laid out at the earliest possible stage. Particularly relevant to Staines Moor SSSI (incl. Shortwood Common) where nitrate emissions from traffic could increase costs of management or impact compliance with statutory maintenance of favourable condition.
95	5.178	Paragraph 5.178 says that the SoS "will give due consideration to any harm to the detriment of biodiversity and geological features of regional or local importance which the Secretary of State considers may result from proposed development. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent, although the mitigation hierarchy applies to these sites". Given the scale of development, which presents the possibility of severely damaging a large number of locally designated sites and thus a significant proportion of the landscape-scale network of wildlife sites surrounding Heathrow, it is not agreed that these sites should be demoted to a lesser importance. Rather, these sites present targeting opportunities for any BNG which is deemed necessary to deliver off-site, as alluded to in sections 5.181 and 5.182.
96	5.180	Paragraph 5.180 states that the SoS "should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland, and ancient and veteran trees, unless there are wholly exceptional reasons (for example where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists".

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		It is particularly important that impacts on the Priority Grasslands within designated sites, such as Staines Moore SSSI, from increased traffic volumes on the adjacent M3 and M25, and with commuters trying to avoid these main routes using others such as Moore Lane as a cut through, during both construction and operational phases are fully considered, and adequate compensation measures put in place. This section should also include similar protection for TPO trees which could be impacted by development.
97 – 101	5.184 – 5.210	The HENPS should require preparation of a Strategic Green Infrastructure Strategy extending across local authority boundaries and integrating biodiversity net gain, nature recovery, climate resilience, flood attenuation, public access and active travel into a coherent landscape-scale network. The current provisions remain focused on mitigation rather than strategic environmental enhancement. Environmental enhancement measures should align with Local Nature Recovery Strategies, emerging green infrastructure strategies, Green Belt objectives and landscape character priorities. Long-term governance, funding and maintenance arrangements should be secured through the DCO process. Previous concerns raised through the EIA process regarding the loss of open space, recreational land and impacts on the Colne Valley Regional Park remain largely unresolved. The HENPS should require applicants to demonstrate how land take has been minimised and how replacement provision delivers equivalent or enhanced recreational, biodiversity and environmental benefits. Open space should be recognised as part of a wider green infrastructure network delivering biodiversity, recreation, public health, climate resilience, water management and landscape benefits. The HENPS should reflect this multifunctional role when considering land take, mitigation and compensation proposals. The adopted Local Plan and emerging evidence demonstrate significant housing and employment land pressures across the Borough together with substantial environmental and infrastructure constraints. The HENPS should require applicants to demonstrate that airport expansion will not sterilise land

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		needed to meet future development requirements or undermine authorities' ability to deliver housing, employment and infrastructure growth identified through Local Plan evidence.
98	5.188	'Construction and operation of airport facilities is a potential source of contaminative substances (for example, through de-icing or leaks and spills of fuel). Where pre-existing land contamination is being considered through development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum.' This is not placing any emphasis on how the operator will plan for reducing the possibility of contaminated substances entering the environment during the operational phase of the expansion or during the construction phase. Plan should be in place with appropriate training for staff to ensure that spills are dealt with appropriately and avoided, and that de-icing procedures have the environment in mind with suitable safeguards to prevent run-off which can cause land contamination and enter watercourses.
99	5.194	'The applicant should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination. In doing so, the applicant should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed. The applicant is encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination.' A soil management plan is encouraged with appropriate supervision of work fronts; see comment concerning SiLC.
99	5.195	'For developments on previously developed land, the applicant should ensure that they have considered the risk posed by land contamination, and where contamination is present, the applicant should consider opportunities for remediation where possible. It is important to do this as early as possible as a part of engagement with the relevant bodies before the official pre-application stage'

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		SBC welcome engagement, an appropriate data sharing agreement may be required which takes time to be established therefore early engagement is advised.
100	5.198	'Where land is remediated it should, as a minimum, not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. The applicant should have regard to statutory regimes and relevant Government policy and guidance such as the National Planning Policy Framework and Planning Practice guidance.' SBC would expect that remediation would meet the same best practice standards applied under the planning regime, which are of greater standard than under Part IIA of the Environmental Protection Act 1990.
101	5.208 – 5.210	Concerns raised consistently since 2018 regarding Green Belt impacts remain relevant. Whilst the HENPS recognises Green Belt protection, greater emphasis should be placed on demonstrating how impacts have been avoided and minimised through design and site selection, and how strategic compensation will strengthen wider Green Belt functionality and openness. The HENPS should recognise that authorities surrounding Heathrow are currently preparing Local Plans and reviewing evidence relating to future land needs, environmental assets and Green Belt function. Airport expansion and associated development should not prejudice the ability of local planning authorities to consider future spatial options through the plan-making process.
104	5.226	'The effects of removing the Lakeside Energy from Waste plant upon capacity for treatment of waste will require assessment.' Local authorities should be consulted on the location of any replacement facilities, and the emissions of such facilities should be considered in the environmental assessments.
121 – 124	5.308 – 5.326	It is welcomed that the HENPS explicitly recognises that landscape impacts include tranquillity effects. However, concerns raised through both the 2018 consultation process and the EIA response remain unresolved. Greater emphasis should be placed on landscape character, sense of place and tranquillity rather than focusing predominantly on visual impacts.

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		The HENPS should recognise the close relationship between landscape character, Green Belt function, green infrastructure and place identity. Assessment should consider implications for future growth, recreation, environmental quality and local distinctiveness, not solely visual amenity.
121 - 122	5.309 – 5.314	Applicants should be required to assess impacts on landscape character, tranquillity, dark skies, recreational experience and environmental quality over an appropriately broad study area. The study area should reflect the scale of Heathrow expansion and associated infrastructure works rather than relying solely on visual zones of influence.
122 – 123	5.319 – 5.323	The reference to the Protected Landscapes Duty is welcomed. However, more explicit reference should be made to assessing and mitigating effects on the Chilterns National Landscape, including impacts on tranquillity, landscape character and recreational enjoyment.
126	5.340	'The Secretary of State recognises that, in addition to providing economic growth and employment opportunities, development covered by this NPS will also have negative impacts upon local communities. This will include impacts through land take requiring the compulsory acquisition of houses that fall within the new boundary of the airport, exposure to air quality impacts, and aircraft noise, that is both an annoyance and can have an adverse impact on health and cognitive development.' Stanwell and Stanwell Moor are areas of greater deprivation, with higher rates of poor health when compared with other areas of Surrey. Airport expansion will therefore be an additional negative effect on people who are already have higher levels of health and disadvantage. Both Stanwell and Stanwell Moor continue to suffer from negative impacts of being near the airport e.g. unscrupulous airport parking firms leaving cars in residential streets; Taxi drivers using the roads as a toilet. The Public Space Protection Order (PSPO) introduced in Stanwell Moor in May 2024 followed years of resident lobbying over anti-social behaviour linked to taxis and private hire vehicles, but this has not removed the problem. Residents should not have to pay for parking schemes and suffer the inconvenience caused by airport-related parking when they did not create the problem. They need real enforcement, clear accountability and a long-term solution.

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		Parking controls will need to be put in place in Stanwell Moor and large parts of Stanwell. Provision of Airport taxi/private hire facility/shuttle bus service to be provided by Heathrow. Traffic restrictions/speed restrictions need to be in place to prevent the area being used as a cut through.
126	5.341	The Secretary of State expects the applicant to provide an appropriate community compensation package, relevant to planning, that goes beyond the statutory requirements. This will include financial compensation for residents who will see their homes compulsorily acquired, as well as ongoing financial compensation to the local community. In addition to controlling and reducing aircraft noise impacts, the applicant will be required to commit appropriate resources to mitigate the impacts of aircraft through noise insulation programmes for both private homes and public buildings such as schools. Further information is required to find out how this will apply to residential premises owned by the council/ social housing providers. Stanwell has very high numbers of residents in social housing. Will all public buildings such as village halls, Dr's Surgeries and community centres be eligible for this?
127	5.346	In addition to statutory requirements, the applicant will be expected to offer the following, or equivalent or better, compensation: • To pay 125% of market value, plus taxes and reasonable moving costs, for all owner-occupied homes within the compulsory acquisition zone; • To pay 125% of market value, plus taxes and reasonable moving costs, for all owner-occupied homes within an additional voluntary purchase / acquisition zone incorporating the area known as the Heathrow Villages; Will Stanwell/Stanwell Moor residents be within the compulsory acquisition zone or voluntary purchase acquisition zone, given their location next to the new car park, the new roads/tunnels? To offer to provide full acoustic insulation for residential property within the full single mode easterly and westerly 60 dB LAeq,16h187 noise contour of an expanded airport;

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		Many/most sites in Stanwell fall within our 57-60dB, largely in line with our planning conditions. Any acoustic insulation, which is greater at mitigating noise levels than normal double-glazing, will be sufficient to protect our residents from noise as a result of aircraft noise. However, with the possible re-routing of the M25 and possible new train lines being introduced, there may be noise and/or vibration introduced to new areas of Stanwell or the Borough, which previously did not have noise and/or vibration problems. The Council will require detailed maps of areas in the current affected zones and areas which will be affected by the new proposed developments and noise/vibration predictions. To provide a contribution of up to £3,000 for acoustic insulation for residential properties within the full single mode easterly and westerly 57 dB LAeq,16h or the full 55 dB Lden188 noise contours of an expanded airport, whichever is the bigger; and To deliver a programme of noise insulation and ventilation for schools and community buildings within the full single mode easterly and westerly 60 dB LAeq,16h contour. The phrase "whichever is the bigger" covers this element but it would be preferrable to provide acoustics insulation in the affected areas unless the residents reject the insulation works. The possible negative eventuality is that residents may take £3000 and not insulate their properties and then later complain about noise. Some properties may require more than £3k to insulate and some will require less. Making it mandatory to insulate unless insultation is rejected, is the way forward. We will need further information on which properties are in the current zone and in the prospective new noise/vibration sources depending on aircraft, road and rail movements.
128	5.348	The Airports Commission suggested this should take the form of a national noise levy paid for by passengers. The Government does not consider a national levy appropriate, but supports the development of a community compensation fund at an expanded Heathrow Airport. The Government expects that the size of the community compensation fund will be proportionate to the environmental harm caused by expansion of the airport. The Government notes that, in its consideration of a noise levy, the Airports Commission considered that a sum of £50 million per annum could be an

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		appropriate amount at an expanded Heathrow Airport, and that, over a 15-year period, a community compensation fund could therefore distribute £750 million to local communities. A sports facility in Stanwell is desperately needed as residents currently struggle to access the leisure centre and swimming pool in Staines upon Thames. Spelthorne Borough Council would like to see investment in this type of facility. Sport England facility costs provide an indication of the cost of a small local leisure centre. A small centre 1,170 (m^2) could cost around £6,325,000. (20 x 8 m pool, multi-purpose studio hall, 20-station health and fitness gym and reception hub). In addition, improvements/investment into community halls/family centres in the area are required to make sure they are utilised as multi-purpose halls. A contribution towards subsidising activities would also be useful, especially activities to improve health and wellbeing in the area.
128	5.349	Expansion at Heathrow Airport is likely to increase the amount of locally collected business rates in the area. The Government will consider how authorities can benefit from this through a business rate retention scheme and the opportunities for authorities to work together to share the benefits. Heathrow Airport is consistently one of the highest single-site business rates payers in the UK. Clarification should be provided as to the extent that local authorities outside the collecting Council will benefit from this.
128	5.352	The Government recognises that the relocation of residents, and the wider impacts of major development on local communities, could have a health effect on wellbeing associated with stress and anxiety189. An applicant is expected to put in place appropriate support services to assist residents within the Compulsory Purchase Zone, including identifying vulnerable residents who may need additional assistance to relocate. The applicant should also consider residents living outside the Compulsory Purchase Zone but within communities that may be significantly affected by the

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		development, including those immediately adjacent to the Compulsory Purchase Zone or who will experience dramatic changes to their living environment because of Heathrow expansion. Further clarification is required on the Compulsory Purchase Zone parameters and extent. There are many vulnerable residents in Stanwell and Stanwell Moor who will be significantly affected by the new airport, roads, tunnels and car park proposals. The area already has high levels of mental health and issues connected with poverty. There should be consideration given to a wider compensation zone.
129	5.353	The applicant should demonstrate that it has considered the need for staff, engaging directly with affected residents, having the ability to recognise and respond to the mental health effects associated with the development. This could include ensuring those staff members have received appropriate mental health awareness training, working with local support groups that have insight into vulnerable residents or communities, and establishing named contacts to facilitate one to one communication and a clear understanding of individual needs. The specific support the applicant will need to provide will depend on the issues faced by individual residents. The applicant should ensure it has appropriate services in place so that residents with additional needs are not disadvantaged. The community groups working in Stanwell and Stanwell Moor are already working at full capacity supporting vulnerable residents. These vulnerable residents are often very reliant on/only trust specific support workers. Careful thought will need to be given into the best ways of supporting these residents. Spelthorne Borough Council is happy to signpost to these community groups so that they can outline their requirement.
129	5.355	The Secretary of State will also consider whether the applicant has consulted on the details of a community compensation fund, including source of revenue, size and duration of fund, eligibility, and how delivery will be ensured. As mentioned above, consultation must be face to face in addition to online and at a variety of times to suit the demographic. E.g. many Stanwell residents will not go out at night due to fear of crime/antisocial behaviour.

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129 – 130	5.357 – 5.360	A community engagement board is required to be developed at Heathrow Airport to help ensure that local communities can contribute effectively to the delivery of expansion, including to consultations and evidence gathering during the planning process. It is considered this board should be established through the Council for the Independent Scrutiny of Heathrow Airport (CISHA) or through arrangements closely linked to CISHA, recognising its existing role in independent community scrutiny at Heathrow Airport. Spelthorne Borough Council is happy to assist with the promotion of this board and will provide contacts for local community groups who could also promote it. It is important that this board represents the whole community.
General comments	General comments	The DCO wording the Secretary of State will need to very carefully consider how the phasing will be taken into account and should have wording that enables checks to be in place. For example under previous DCO's condition/contamination wording has been utilised which is not in line with the best practice that local authorities follow which is to have a multistep condition where appropriate assessments are submitted for review to ensure that sampling strategies meet best practice before sampling takes place, then the sampling data in report form is sent back to an authority to check again to make sure that it has been correctly interpreted and that any hotspots have been identified and then the remediation strategies are reviewed to make sure contamination found should be addressed before finally the remediation takes place in a post-remediation report is submitted confirming the remediation has been successful as a validation report. Without this process in place significant effects cannot be fully assessed or mitigated.
		The statement is considering climate tests in terms of emissions, but climate change is also going to impact upon the development of Heathrow. Heathrow are experiencing high winds currently in the middle of a heatwave and these weather conditions which will be encountered more frequently, will impact upon operations at the airport more in the future. Heathrow tends to be one of the meteorological sites that come in with the higher temperatures nationally and therefore any development there needs to be really testing itself against what can be quite challenging weather conditions and ensuring that the development can operate robustly under what will be more extreme

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		conditions than they operate under now. Odour coming of the airport (for example fuel odour) will increase under these conditions of heat with strong winds. There will be elements of the assessments whereby they need to make sure they considered more extreme conditions than the baseline conditions. Climate considerations are important for facilitating active travel and bus travel, commuters will need shade and shelter provisions when utilising either mode.
		The policy states that it covers changes to the strategic road network but potential changes to the southern perimeter road need to be considered, whilst this may not qualify as a strategic road by definition it is very strategic in terms of accessing Heathrow and the surrounding areas, and traversing Heathrow when it is not the destination as it is necessary for other traffic to make its way around the outside of the airfield. There will potentially be changes to the southern perimeter road and the A3044 and it is important to determine where traffic that uses these routes currently will be routed during construction and during operation; will it be through residential areas such as Stanwell? If so, this needs to be modelled so that the impacts on air quality can be known alongside the impacts of any southern access and car parking. There will be impacts on bus routes and taking buses through neighbouring modified motorway junctions risks them being stuck in queuing traffic without bus priority measures.
		Nationally scarce / declining habitats should elicit a higher expectation for BNG due to development risk – a greater comment on the understanding of the “overall large-scale landscape level effect” not just pockets of habitat banks, smaller sites affected individually. A greater understanding and appreciation apparent for specific habitat groups via SoS / host LPAs technical strategy working groups, eg Declining grasslands / Riparian / watercourses / as part of the greater green and blue infrastructure. Attendance at a technical working group meeting in July 2026 showed that there were unclear and concerning design approaches for mitigation of habitat loss for Rivers / Waterbodies, to favour flood design criteria and “necessary channel in filling” due to development. Mottmac led the discussion; no specific design criteria and mitigation suggestions showed any relevant biodiversity retention or adherence to habitat regulations requirements. Current concern for EIA for specific habitats.

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		No reference throughout (unless still too early to address / implement or show how will be implemented), is INNS / Bio-Control of Schedule 9, Invasive species Act / Construction Regs compliance with these Acts. Non-native invasive species introduced because of rogue seed stock / non governed importation of undesirable species that can hybridise with native stock, as above, diluting genetic diversity and climate resilience.
53 – 54 89 – 90 97 – 101	Strategic Planning, Delivery, and Infrastructure	The adopted Local Plan identifies that future growth is dependent upon the timely delivery of infrastructure, including transport, healthcare, education, leisure, community facilities, green infrastructure and flood mitigation. The HENPS should therefore require Heathrow expansion proposals to demonstrate not only how project-specific impacts will be mitigated, but also how expansion will contribute towards the delivery of strategic infrastructure required to support planned growth across affected authorities. Expansion should not place additional pressure on already constrained infrastructure networks.
53 – 54 97 – 101 121 – 124	Strategic Planning (Cross-cutting)	The HENPS should place greater emphasis on integration with emerging Local Plan evidence bases. Local evidence demonstrates strong economic connections with Heathrow, significant future housing requirements, projected employment growth and constraints on land availability. Expansion proposals should therefore demonstrate consistency with strategic spatial planning objectives and support, rather than undermine, authorities' ability to meet identified development and economic needs. The HENPS should acknowledge the important role of adopted local design codes in shaping development outcomes. Airport expansion proposals should demonstrate how they support locally adopted objectives relating to placemaking, green infrastructure, landscape quality, sustainable movement, climate resilience and community wellbeing. The HENPS should better recognise the importance of supporting healthy, vibrant and sustainable communities. Emerging local evidence demonstrates a strategic shift towards mixed-use growth, environmental enhancement, leisure and community facilities, accessible town centres and resilient neighbourhoods. Heathrow expansion should support these long-term place-shaping objectives.

Page	Paragraph Number	HENPS text in black: Spelthorne comments in blue
		The HENPS should give greater weight to adopted development plan policy. The Spelthorne Local Plan identifies Heathrow as a significant economic driver but also recognises substantial constraints including Green Belt, flood risk, environmental capacity and infrastructure requirements. Airport expansion proposals should demonstrate how they support the delivery of adopted Local Plan objectives rather than creating additional barriers to sustainable growth.