



# HEATHROWWEST

Your Choice For A New Terminal

## Response to Heathrow Airport Limited's Airport Expansion Statutory (Stage Two) Consultation – response by Heathrow West Limited and the Arora Group

### 1. EXECUTIVE SUMMARY

- 1.1 This is a response on behalf of Heathrow West Limited<sup>1</sup> and the Arora Group to Heathrow Airport Limited's ('HAL') Stage Two Consultation on their Northwest Runway expansion scheme.
- 1.2 Heathrow West Limited and Arora Group believe that there is a better way to expand Heathrow which meets the requirements of the Airports National Policy Statement (ANPS, June 2018) and, crucially, which delivers maximum benefits to airlines, passengers and communities.
- 1.3 Heathrow West Limited has developed an alternative new terminal-led solution to support the new runway. We are currently preparing a separate Development Consent Order (DCO) application for the Heathrow West terminal and other necessary infrastructure to accommodate the terminal. The new terminal will be located to the west of Terminal 5.
- 1.4 There are significant and material deficiencies in the HAL Stage Two proposals which can be remedied by the Heathrow West scheme. These can be summarised as follows:
  - **Inefficient land use and operational layout which results in excessive third-party land proposed for compulsory acquisition** – the preferred HAL masterplan proposes two new terminals within the western area of the airport – T5X and T5XN – Heathrow West can deliver the same capacity in one terminal which significantly reduces the amount of land required and with improved connectivity for passengers and baggage. Even assuming HAL's own preferred proposals, the ANPS capacity requirements can be met without T5XN;
  - **Impact on the Green Belt** – the preferred HAL masterplan includes significant incursion into the Green Belt – impact on Green Belt is reduced in the Heathrow West proposals by reducing the size of the Southern Parkway to better meet demand and removing the HAL diversion of the A4 to the north of Harmondsworth by keeping it broadly on its existing alignment;
  - **Construction will be dispersed over many construction sites and a long period of time** – HAL's preferred masterplan results in nearly 30 years of disruption to local communities around Heathrow, with terminal development

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<sup>1</sup> Heathrow West Limited is a special purpose vehicle forming part of the wider Arora Group which has been set up specifically for the purpose of the Heathrow expansion proposal.

not completed until 2050. Heathrow West can be built almost 20 years earlier (by 2032 at the latest) to significantly reduce the long period of disruption for local communities which is unavoidable in HAL's plans. Further, Heathrow West provides flexibility to bring on capacity earlier if required;

- **The proposals fail to make public transport the most attractive means of accessing T5X and T5XN** – there is limited information on the proposed public transport interchange at T5X and we have significant concerns that it will be difficult to make this a truly attractive option with the T5 multi-storey car park still in place. Heathrow West provides greater opportunities for an enhanced public transport experience between T5 and the proposed single new terminal;
- **Car parking is consolidated into unsuitable locations** - HAL's parking solution is through consolidation and provision of the majority of car parking in a new Northern and Southern Parkway. This is primarily driven by the loss of large areas of car parking on the Bath Road through the provision of the T5XN terminal. It is proposed to locate over half of the parking to the south of the airport, when most trips are from the north west, north east and east resulting in greater impact on air quality and noise. Heathrow West provides parking predominantly to the north, reducing traffic movements around the airport and the impact of parking on local communities;
- **The proposed rivers solution consolidates three rivers into a narrow corridor, with unavoidable impacts upon water quality and biodiversity** – Heathrow West propose to address this by relocating the River Colne to the west of the M25;
- **HAL's Stage Two consultation proposals fail to minimise the capital costs of expansion** – the dispersed approach taken by HAL increases land take and expenditure by providing more development than is needed to deliver the same capacity. Whilst the airport operates in a monopoly there is no incentive to minimise costs. By introducing competition, costs are reduced and quality is improved.

1.5 Given the existence of an alternative proposal which delivers the same capacity whilst using less land, HAL has failed to demonstrate that it needs all of the land identified to deliver the DCO. It has therefore failed to meet the legal requirements for compulsory acquisition ('the CPO test').

1.6 Arora Group also has significant concerns as a landowner that there is insufficient information in HAL's consultation to enable landowners to be able to meaningfully respond on proposals to acquire and use their land as part of the expansion proposals. For example, HAL propose to dramatically reduce the level of staff parking at the airport, much of which is used by existing businesses, without indicating precisely how much will be lost or retained, and where. Its loss will have significant effects on the ability of businesses to continue to operate and therefore this must be done in a planned and collaborative manner, in association with these businesses, including Arora Group. Once proposals have been developed further, they then need to be the subject of full and proper consultation.

- 1.7 There are also significant deficiencies in the way and ease with which the Stage Two consultation documents can be found and the accuracy of the information within them. This includes inconsistencies between consultation documents which make it very difficult for the public, landowners and other consultees to understand precisely what is proposed and to provide meaningful responses to the consultation.
- 1.8 The Heathrow West proposals enable competition to be delivered at Heathrow and break the cycle of inefficient use of investment predicated by the Regulated Asset Base. This will offer meaningful benefit to airlines and consumers.
- 1.9 Heathrow West's preference is to work collaboratively with HAL on the expansion proposals and are engaging proactively with the CAA to ensure that the regulatory framework to enable this can be delivered. We would therefore ask HAL to consider our response and adopt the proposals being promoted by Heathrow West. If this is done, it would address many of our concerns regarding the physical, social and community impacts of HAL's Stage Two proposals; however, to achieve the full efficiency and competition benefits of Heathrow West, HAL would need to work jointly and collaboratively with Heathrow West Limited.

## 2. Introduction

- 2.1 This is a response on behalf of Heathrow West Limited and the Arora Group to HAL's Stage Two Consultation on their Northwest Runway expansion scheme.
- 2.2 The Arora Group support the expansion of Heathrow Airport, including the new runway as selected by the Government and in accordance with the requirements of the ANPS. However, we firmly believe that there is a better way of delivering certain critical components of the expansion. Put simply, Heathrow Airport Limited's proposals do not represent the best solution for the expansion of Heathrow Airport.
- 1.3 Heathrow West Limited has developed an alternative new terminal-led solution to support the new runway. We are currently preparing a separate Development Consent Order (DCO) application for the Heathrow West terminal and other necessary infrastructure to accommodate the terminal. The new terminal will be located to the west of Terminal 5.
- 2.4 Our proposals will fit in with the other components of Heathrow Airport Limited's proposals, including the new Northwest Runway, changes to the M25 and some new terminal capacity in the Central Terminal Area (CTA). We will also be consistent with many parts of the mitigation proposed through the Stage Two consultation, including sites for ecological mitigation and flood storage and new and displaced hotels and offices. Together, our DCO and elements of HAL's DCO will deliver a comprehensive scheme that meets the requirements of the ANPS and, crucially, in a way that delivers maximum benefits to airlines, passengers and communities.

- 2.5 Our involvement in the construction and operation of the new terminal will also introduce much needed efficiency and competition at Heathrow Airport. Heathrow Airport is currently the most expensive hub airport in the world.
- 2.6 We are continuing to develop our proposals, and have carried out our Stage One, non-statutory, consultation on our vision and initial proposals. We also continue to engage with key stakeholders. We will be undertaking our Stage Two, statutory, consultation in early 2020.

### 3. The Arora Group, Heathrow West and the case for competition

- 3.1 The Heathrow West proposals are supported by the Arora Group, who are both a business operator at Heathrow and a significant landowner within the expansion area being consulted on through HAL's Stage Two consultation. Arora therefore has a significant interest in how Heathrow expands.
- 3.2 HAL has met with the Arora Group as a landowner affected by its proposals but has made no attempt to engage with our developing proposals for Heathrow West, despite attempts from us to work collaboratively.
- 3.3 There is strong Government support for delivering competition at airports. The Civil Aviation Act (2012) specifically allows for competition between terminals as a means of enacting the Government's desire to provide for competition at airports. This includes the demonstration of the market power test. The Civil Aviation Act 2012 was put into law to reflect the recommendations of the Competition Commission (now the CMA).
- 3.4 Heathrow West Limited has commissioned an independent study on the strong case for terminal competition, which will be published shortly. This report explains that under the existing model all passenger terminal infrastructure at Heathrow is under the ownership and operation of HAL. Airport charges and service offerings are regulated to provide HAL with an expected return on all efficiently incurred investment in its RAB (Regulated Asset Base). Provided the allowed return is at least acceptable to shareholders HAL will have a financial objective to maximise the RAB – a phenomena known as 'gold plating'. In the absence of competition, HAL has insufficient incentive to develop and implement its investment plans in a way that provides the best value for money either for airlines or ultimately for passengers. There is no opportunity for direct market testing of HAL's expenditure other than the tenders that HAL itself organises for suppliers and contractors to undertake work on HAL's own design, and the "efficiently incurred expenditure" test appears to have little effect on HAL's remuneration. Neither is there a strong incentive for HAL to develop its service offerings in a way that best meets the needs of passengers and airlines that could take-up the new capacity at Heathrow - be they low cost or full-service carriers, and point-to-point or network operators.

- 3.5 Case studies from around the world show that:
- i. independent operation of passenger terminals is common, and consistent with ensuring that all airport operators – airfield, terminals, emergency services, border force, air traffic control, retail franchises and many others – work together; and
  - ii. there are strong benefits to passengers from introducing competition in airport services – from the break-up of the former BAA, to competition in specialised airport services such as baggage handling.
- 3.6 The report also finds that the evidence leads clearly towards the benefits of unlocking choice in design and competitive forces in the operation of passenger terminals at Heathrow. These benefits include:
- i. Design: competition in the design of terminal capacity will lead to increased innovation and focus on passenger and airlines interests. This relates not only to the features and costs of the new terminal capacity, but also in relation to location within the airport, the plan in relation to how quickly capacity is to be brought onstream, as well as options relating to associated airport infrastructure and community engagement.
  - ii. Construction: an independent operator will have stronger incentives to bring capacity online on time and on budget.
  - iii. Operation: an independent owner of terminal capacity will have increased incentives to offer commercial deals with an appropriate balance of costs and quality of service, in the interests of airlines and passengers.
- 3.7 In addition to providing benefits over the HAL proposals from a land take, environmental and community perspective, Heathrow West’s objections are therefore founded on the strong and evidenced principle that competition at Heathrow would deliver significant benefits to passengers, airlines and the wider economy.
- 3.8 The ANPS specifically allows for this competition and explicitly states that it is not specific to a particular promoter (paragraph 1.15) and that the NWR scheme can be applied for through more than one DCO (paragraph 1.16). This was endorsed by the High Court in May 2019 [Case Nos CO/2760/2018, CO/3089/2018, CO/3147/2018 and CO/3149/2018] which made it clear in paragraph 204 that the nature of future development of Heathrow was very much affected by rival plans for development consent relating to the NWR Scheme.

## 4. Adequacy of Consultation

- 4.1 Before setting out our principal concerns with the proposals currently being consulted on by HAL, we wish to raise a fundamental concern on the adequacy of the consultation carried out, both in terms of the quality and consistency of the

materials published as part of the consultation, and the adequacy of consultation with the Arora Group as a landowner.

#### 4.2 Our concerns are as follows:

1. **Ability to find consultation documents and navigate website** – it is very difficult as a third party to easily locate documents which are critical to HAL’s consultation. The documents are not located in an easily accessible part of the website and it is not easy to move between pages and documents. For example, to find the Preliminary Environmental Information Report (PEIR) Figures, you need to click on “search website” and then scroll to the bottom of the page to see the list of document collections and click on PEIR Volume 2, which takes you to a list of the figures. As critical documents to the consultation, these should all be easily accessible from the consultation home page and, when compounded with our points 2,3 and 4 below result in an inadequate consultation.
2. **Number of documents, repetition and inconsistency** – given the extent of HAL’s documents, it is difficult to determine precisely which ones are relevant for each topic and to easily access information by topic. For example, to find out what is proposed in any particular site, the reader has to look at the Preferred Masterplan, community area documents and the Illustrative Masterplan which is at Figure 6.1 of the PEIR. This leads to inconsistencies (the most relevant of which we highlight in relation to our objections below) and confusion over precisely what is proposed and being consulted on. There are also numerous other examples. For example, the Surface Access document contains narrative on the approach to parking, but the indicative parking masterplan together with allocation of spaces, is buried in the Scheme Development Report.
3. **Inconsistency on Airport Supporting Development proposed** - There are also inconsistencies in floorspace proposed for Airport Supporting Development, for example, Zones ABCDEFKL&R of the Preferred Masterplan accommodate a combined 102,250sqm of industry, whereas the PEIR Chapter 6, Table 6.8 is inconsistent, stating provision of 151,500sqm of industrial development. Zones BCFGQ&R of the Preferred Masterplan accommodate a combined 351,300sqm of hotels, whereas the PEIR Chapter 6, Table 6.8 is inconsistent, stating provision of 375,500sqm of hotel development. This leads to significant confusion on precisely what is proposed in each area.
4. **Lack of adequate consultation with the Arora Group as a landowner and appropriate clarity over the use of land to be acquired** – as set out below, HAL has only met with Arora on two occasions and these have been general meetings, rather than giving clarity on precisely what rights HAL is seeking on land owned by Arora, or what the land is proposed to be used for under HAL’s scheme.

5. **Lack of maturity of PEIR and mitigation proposals** – Heathrow West Limited has been in separate correspondence with HAL to request further information on its proposals to enable the Heathrow West scheme to be developed further and to have sufficient understanding of HAL’s construction, operation and effects, to allow us to properly integrate our plans. HAL had indicated that much of the requested information would be available in the PEIR. We have written to HAL separately on this but note for the purposes of the consultation that we do not believe that sufficient information has been provided to enable consultees to develop an informed view and to adequately respond to and influence the proposals. We highlight this in relation to a number of key areas in our responses below.

## 5. Principal Objections and Benefits of Heathrow West

5.1 HAL’s Stage Two consultation proposals do not represent the best solution for the expansion of Heathrow Airport. Our key issues with the proposals are as follows:

- **Inefficient land use and operational layout which results in excessive third-party land proposed for compulsory acquisition;**
- **Unnecessary impact on the Green Belt;**
- **Construction will be dispersed over many construction sites and a long period of time;**
- **The proposals fail to make public transport the most attractive means of accessing T5X and T5XN;**
- **Car parking is consolidated into unsuitable locations;**
- **The proposed rivers solution consolidates three rivers into a narrow corridor, with unavoidable impacts upon water quality, geomorphology and biodiversity;**
- **HAL’s Stage Two consultation proposals fail to minimise the capital costs of expansion.**

5.2 Heathrow West Limited’s preference is to work collaboratively with HAL on the expansion proposals. We would therefore ask HAL to consider the responses below and adopt the proposals being promoted by Heathrow West. If this is done, it would address many of our concerns regarding the physical, social and community impacts of HAL’s Stage Two proposals; however, to achieve the full efficiency and competition benefits of Heathrow West, HAL would need to work jointly and collaboratively with Heathrow West Limited.

5.3 The key benefits of the Heathrow West scheme that would remedy the deficiencies in the HAL proposals, which we explain with reference to our objections later in this response, are as follows:

- Delivery of a single terminal design, in the west, which provides 40MPPA capacity, but in a smaller, more focussed area that allows for a true intermodal interchange;
- Reduced impact on Green Belt to the south securing greater buffering of the local community from significant parking areas proposed by HAL to the south;
- Provision of an access strategy for the new terminal that focusses parking provision on existing parking areas, whilst minimising additional parking required on Green Belt land and connecting with HAL's wider masterplan;
- Delivery of a sense of place with provision of new gateways to the new terminal and T5, with gateways to the north (between the existing northern and new northwest runway and from Junction 14);
- A parking strategy that is influenced by gravity modelling rather than generating movement/demand driven by proposed parking locations;
- Generation of an opportunity for the creation of a dramatic arrival, through the removal of the T5 multi-storey car park;
- Overall improvements to the strategy for the River Colne;
- Development of a more integrated Green Infrastructure Strategy; and
- Omission of A4 diversion as proposed by HAL.

5.4 We expand on our key issues below in the context of Government Policy set out in the ANPS.

## 6. Inefficient Land Use

6.1 We object to the proposals consulted on by HAL on the grounds that they represent an inefficient operational layout. We expand on our concerns regarding the inefficient layout and its impact on land required for compulsory acquisition below, together with suggestions for how this could be remedied.

### Inefficient Operational Layout

6.2 The preferred HAL masterplan includes new terminal infrastructure - T5X and T5XN, two new satellites and extensions to the Central Terminal Area and two existing satellites. The terminal option for the western part of the airport, consulted on by HAL in the Stage Two consultation, requires significantly greater acquisition of land than a single terminal, without delivering any additional capacity.

6.3 T5X is proposed by HAL to accommodate 20 million passengers per annum (mppa) and T5XN a further 17.5 mppa. Heathrow West is proposing a single new terminal to the west of Terminal 5, which will accommodate 40 MPPA. We therefore disagree that there is a requirement for two terminal buildings in order to accommodate the ANPS required passenger growth, or even higher levels.

- 6.4 HAL's proposals are for a single, large T5X terminal within the western campus area. We consider that stands and capacity can be maximised in this area through provision of a single terminal with a pier, which enables the number of stands to be maximised and therefore a more efficient and effective arrangement.
- 6.5 The HAL proposals for two terminal structures are a significant distance from one another. This results in poor performance in terms of both operational costs for airlines and passenger experience. The proposed satellite T5XN is approximately 1.6km from the terminal building T5X. This results in significant travelling time and distances for passengers and baggage between the check-in area and departure gates, adding complication and costs for operating the systems required to move people and baggage around the airport, and a reduced passenger experience. Time is a critical component to how attractive an airport experience is, particularly for connecting passengers. This is contrary to ANPS Paragraph 3.18 and 3.19 which aims to make more routes viable by increasing the numbers of connecting passengers.
- 6.6 ANPS paragraph 4.31 states that a good design should meet the principal objectives of the scheme by eliminating or substantially mitigating the adverse impacts of the development, for example by improving operational conditions. The proposed design is not in accordance with paragraph 4.31 as the dispersed infrastructure will not improve operational conditions. Paragraph 4.33 states that the scheme should take into account both functionality, including fitness for purpose and sustainability, and aesthetics, including the scheme's contribution to the quality of the area in which it would be located. The proposed design does not demonstrate functionality or sustainability, as required by Paragraph 4.33 by necessitating movements for passengers and baggage over significant distances.
- 6.7 Heathrow West proposes only one terminal in the west, which concentrates new passenger movements in one location. The location of a single terminal structure close to existing terminal buildings, allows for efficiencies in terms of passenger and baggage movements, reducing passenger transfer times against a two-terminal option. Heathrow West also provides a better integration of the existing T5 and the new terminal, with improved connectivity for passengers, baggage and colleagues.
- 6.8 The proposed HAL masterplan includes aircraft stands north of T5X that require departing aircraft to be pushed back on a busy section of the taxiway system. The resulting taxiing delays not only create inefficiencies for the airlines but are also contrary to ANPS paragraph 5.78 which seeks to limit the impacts by improved taxiing efficiency. HAL also fails to provide stands for inactive aircraft close to T5X, resulting in movements of inactive aircraft over greater distances.
- 6.9 Further, the HAL Stage Two proposals show T5XN as a standalone terminal due to the imposed constraints of the T5 multi-storey car park and the Sofitel. Heathrow West have adopted a very different approach, allowing T5 and T6 to be connected providing the opportunity for an enhanced public space that will create an elevated passenger experience integrating the multi modal hub and a truly integrated campus.

- 6.10 HAL's Scheme Development Report (SDR) is intended to explain the rationale for the preferred option and alternatives considered. Whilst there are options in the SDR that include terminal capacity focussed in the west, with no northern satellite (e.g. assembly options A01B and A02B), it is not clear how these have been objectively assessed and discounted compared to the preferred option. Both of these assembly options also include a large northern apron and therefore it is not clear how options with no northern satellite and a smaller northern apron compare. Paragraph 3.3.12 of the SDR states that "capacity analysis has found that new west and east aprons alone would not be sufficient to provide the additional capacity required, therefore a northern apron will be required". However, no rationale appears to have been given for its size. Given the implications that this has in terms of land take, we would have expected a much more detailed analysis of an option which focussed terminal development in the west with a smaller northern apron (as per the Heathrow West option).
- 6.11 Notwithstanding our comments above that Heathrow West should be the preferred option for the delivery of capacity in the west, it is also important to emphasize that the ANPS has effect for expansion proposals that enable at least 260,000 additional air transport movements per annum (equivalent to an additional 40-50mppa), rather than the higher figure targeted by HAL. HAL's own evidence in the SDR shows that the additional capacity required to meet the ANPS requirements can be delivered through the redevelopment of the CTA and improvements to T5 and T5X, without any additional capacity in the northern apron, which delivers only 17.5mppa.
- 6.12 In our view, there is simply no justification in operational layout or capacity terms for the terminal solution being promoted by HAL.

#### Excessive Third-Party Land Proposed for Compulsory Acquisition

- 6.13 The proposed layout of the HAL Stage Two consultation proposals with two new terminal buildings and a dispersed network of aprons and taxiways requires a significant amount of private land to be acquired by compulsory acquisition. Paragraph 4.36 confirms that the tests on compulsory acquisition are set out within the Planning Act 2008. Section 122 of the Act confirms that land may only be included where it is required for the development to which the development consent relates, is required to facilitate or is incidental to that development, or is replacement land which is to be given in exchange for the order land under section 131 or 132. It must also be demonstrated that it is in the public interest for the land to be acquired. The justification for the dispersed layout of the proposed airport infrastructure is unclear, and not properly explained in the SDR, and therefore it is not considered that it has been demonstrated that all the land identified for compulsory purchase is required to facilitate the development.
- 6.14 The Heathrow West scheme proposes a smaller overall area to be compulsorily acquired. Given that an alternative scheme exists that proposes a smaller area of land acquisition it is considered that it has not been demonstrated that it is in the public interest to acquire all land within the HAL Stage Two consultation scheme. It is evident from HAL's own proposals that there are alternative ways of

meeting the ANPS capacity without developing terminal capacity in the northern apron. HAL's Stage Two proposals therefore fail to meet the 'CPO test'<sup>2</sup>.

- 6.15 The terminal strategy being advanced by HAL also results in an inefficient use of the land between the existing northern and new northwest runways. HAL proposes this primarily for T5XN and various airport supporting development. The Heathrow West proposals will be informed by our own Stage Two consultation. However, our current view is that this area could be better used for consolidating car parking, aircraft stands, maintenance and other essential airport facilities, which would enable some of the existing commercial and, potentially, residential uses included within HAL's compulsory acquisition area to be retained.
- 6.16 In summary, the objectives of the ANPS to provide additional airport capacity can be met through our scheme, Heathrow West, which requires the acquisition of significantly less private land than the HAL Stage Two consultation proposals and provides additional benefits.

## 7. Impact on the Green Belt and Heritage impacts

- 7.1 HAL's proposals result in an excessive loss of green belt land, compared to the alternative scenario being promoted by Heathrow West. This is in two principal areas, which are considered in turn:
1. Replacement of the A4 to the north of the airport;
  2. Excessive size of the proposed Southern Parkway.
- 7.2 The Stage Two Statutory Consultation documents propose the replacement of 2.3km of the A4. The proposed A4 replacement creates an inefficient road layout and excessive development of land in the Green Belt to the north of the airport. Paragraph 5.114 of the ANPS confirms that in Green Belts there is a general presumption against inappropriate development within them and applies the National Planning Policy Framework. Paragraph 146 of the National Planning Policy Framework (NPPF) prescribes certain forms of development which are not inappropriate in the Green Belt including local transport infrastructure which can demonstrate a requirement for a Green Belt location. Paragraph 144 of the NPPF states that 'very special circumstances' will not exist unless the potential harm to the Green Belt is outweighed by other considerations. The harm to the Green Belt of the diversion of a large section of dual carriageway, or heavily trafficked single carriageway, is not adequately outweighed by other considerations and HAL does not provide very special circumstances for significant road infrastructure in Green Belt land.
- 7.3 We also believe there is potential for harm to the Grade I listed Harmondsworth Great Barn and Grade II\* Listed Church of St Mary as a result of the introduction

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<sup>2</sup> A Development Consent Order may include powers to compulsorily acquire land where the decision maker is satisfied that it is required for the development to which the development consent relates, which necessarily requires a consideration of alternatives. A compulsory purchase order should only be made where there is a compelling case in the public interest.

of a new road within the setting of these assets, which will require further assessment and justification for example against ANPS paragraph 5.196 or paragraph 5.208. These two assets are of the highest heritage importance and their current setting makes a positive contribution to their significance. The introduction of the A4 diversion (as proposed) would likely result in an alteration to the setting of the Grade I Listed Barn and Grade II\* Listed Church that would represent a degree of harm to the significance of these assets.

- 7.4 In comparison to the HAL A4 proposals for a wide single or dual carriageway, the Heathrow West scheme currently proposes a more minor road connection at this location to reconnect the A3044 with the Saxon Way Trading Estate. This would be a no through road with substantially reduced traffic flows and speeds compared to the HAL proposal.
- 7.5 Heathrow West are proposing a reduction in the size of the proposed Southern Parkway, enabled through the more efficient use of land between the existing northern and new northwest runway. This reduces the loss of Green Belt land and impact on local communities to the south of the airport. This is explained further in Section 9 of this response.

## 8. Dispersal of construction sites

- 8.1 The construction proposals for HAL's DCO require a large number of construction sites, which are dispersed around the airport, often close to existing communities. Paragraph 4.70 of the ANPS states that the construction and use of airports infrastructure has the potential to affect people's health, wellbeing and quality of life. Infrastructure can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests. The Construction Proposals and Draft Code of Construction Practice provide insufficient detail to assess the impacts of the proposals on local communities and therefore Paragraph 4.70 of the ANPS has not been met. More detail should be provided about how each of the proposed construction sites will be used to enable a full assessment of the impact on local communities.
- 8.2 Many of the sites required by the construction works are for borrow pits as a result of the delivery of the proposed terminal buildings late in the construction programme (2050+). Heathrow West would deliver the terminal infrastructure earlier in the construction programme (by 2032 at the latest), providing material which could be used in the construction of the Northwest Runway, although we would work with HAL to ensure that capacity was only brought forward in line with their proposals on Environmentally Managed Growth (see section 9 below). This would result in lower impacts for local residents in terms of reduced traffic from the movement of material around the airport and reduced noise and air quality effects associated with construction vehicle movements.
- 8.3 The dispersal of construction sites around the airport will result in a greater number of traffic movements around the site. Construction sites could be more centralised in order to reduce the impact on local communities. The justification

for dispersing construction work around the airport is not clear from the consultation documents.

- 8.4 At this stage, we are not able to confirm which of HAL's Construction Support Sites would no longer be required in the event of Heathrow West, as there is insufficient information in the consultation to determine the precise use of each of the sites and which ones are required in connection with the terminals, compared to other parts of the DCO. However, we would like to work with HAL to understand more about the precise use of each site, so that this can be determined.
- 8.5 The HAL proposals rely on a railhead at Colnbrook, to the northwest of the expansion site. The location of the railhead, adjacent to the Northwest Runway, will result in vehicles being required to use public roads for most of the construction period as construction work on the Northwest Runway would preclude haul routes through the expansion site. Heathrow West proposes a southern railhead which will allow the majority of construction traffic to travel through the construction site, reducing the impact on local roads. The HAL DCO Project should incorporate a southern railhead to reduce the impacts of construction traffic on local communities.
- 8.6 It is also not clear from the consultation documents precisely what assumptions have been made in relation to home-based and non-home-based workers and how these will be accommodated within the local area, for example, how many are assumed to be living in tourist accommodation, compared to existing caravan sites or in private rented accommodation. On this basis, we cannot comment on whether the caravan sites proposed to be located within the Construction Support Sites are sufficient to mitigate the impacts of either HAL's scheme. We therefore consider that the proposals for worker's accommodation do not provide sufficient information to ensure that socio-economic and traffic impacts will be minimised during the construction period, which is not in accordance with paragraph 4.70 of the ANPS.

## 9. Flexible Phasing of Capacity

- 9.1 HAL's proposals deliver capacity at a late stage in the construction programme, with terminal capacity not being completed until 2050. This has the effect of extending impacts to local communities across a significant time period.
- 9.2 At this stage, we are not able to say precisely when the terminal capacity proposed by Heathrow West would be operational, as it depends principally on how HAL propose to increase capacity in line with their proposals set out in Environmentally Managed Growth. However, Heathrow West can be delivered in a phased manner, by 2032 at the latest. At this stage, we anticipate that capacity would be phased in line with HAL's projection of demand but providing the new terminal earlier would deliver much needed resilience and competition benefits between terminals. Heathrow West also provides flexibility to bring on more capacity earlier, if the demand profile changes.

## 10. Public Transport Attractiveness

- 10.1 Increasing the proportion of journeys to the airport by public transport is a key principle of the ANPS. Paragraph 5.17 confirms that the DCO should increase the proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040 for passengers. The applicant should also include details of how, from a 2013 baseline level, it will achieve a 25% reduction of all staff car trips by 2030, and a reduction of 50% by 2040. We are concerned that the proposals being consulted upon do not prioritise public transport sufficiently to ensure the modal shift required by the ANPS.
- 10.2 In order to achieve the modal shift required by the ANPS, public transport must be a more convenient and attractive option for travel to the airport than private cars. The existing public transport infrastructure consists of the Central Bus Station adjacent to Terminals 2 & 3, bus and coach stands at T4 and T5 and rail stations at Terminals 2 & 3, 4 and 5. An improved public transport interchange within the Central Terminal Area is proposed as part of the Stage Two consultation proposals and reference is made to a new consolidated Public Transport Interchange (PTI) in the west campus, adjacent to Terminal 5 and proposed Terminal 5X at paragraph 6.3.3 of the Preferred Masterplan document. The Statutory Consultation documents provide limited information about the proposed new PTI other than to indicate an increase in bus/coach stands and layovers to accommodate increased demand. There is limited information to demonstrate that the proposals will make public transport a more attractive form of transport for passengers travelling to Terminal 5X.
- 10.3 The proposed satellite, T5XN is in a location remote from both the existing public transport in the Central Terminal Area and the proposed PTI at Terminal 5X. Paragraph 6.2.4 of the Preferred Masterplan states that the satellite will be connected via a new passenger transit system to Terminal 5X. This means that passengers will be required to make multiple trips and interchanges in order to reach their flight, with those using public transport having no clear advantage over those using private transport. This would appear at odds with the guiding principles contained in their HAL's Strategic Brief consultation document (p63) which seek to create "*seamless journeys for passengers*" and "*prioritise public transport*".
- 10.4 The information provided as part of the statutory consultation does not confirm that public transport users will be given priority in the design of the 'Western Campus'. This is a key principle to ensure that the design of the 'Western Campus' encourages access by public transport. The proposed retention of the Terminal 5 multi-storey car park between the existing terminal and new terminal would create a segregated and car-dominated design (with the car park a prominent feature of the proposed 'Western Campus'). The functions of T5X and T5XN can be consolidated in a single terminal building to the west of Terminal 5. Our DCO proposals will demonstrate that by locating a single terminal building in the west an enhanced public transport experience can be delivered by the provision of a new bus and train interchange between the

existing Terminal 5 and proposed new terminal. Public transport users can be given priority in the design of the interface between the terminals.

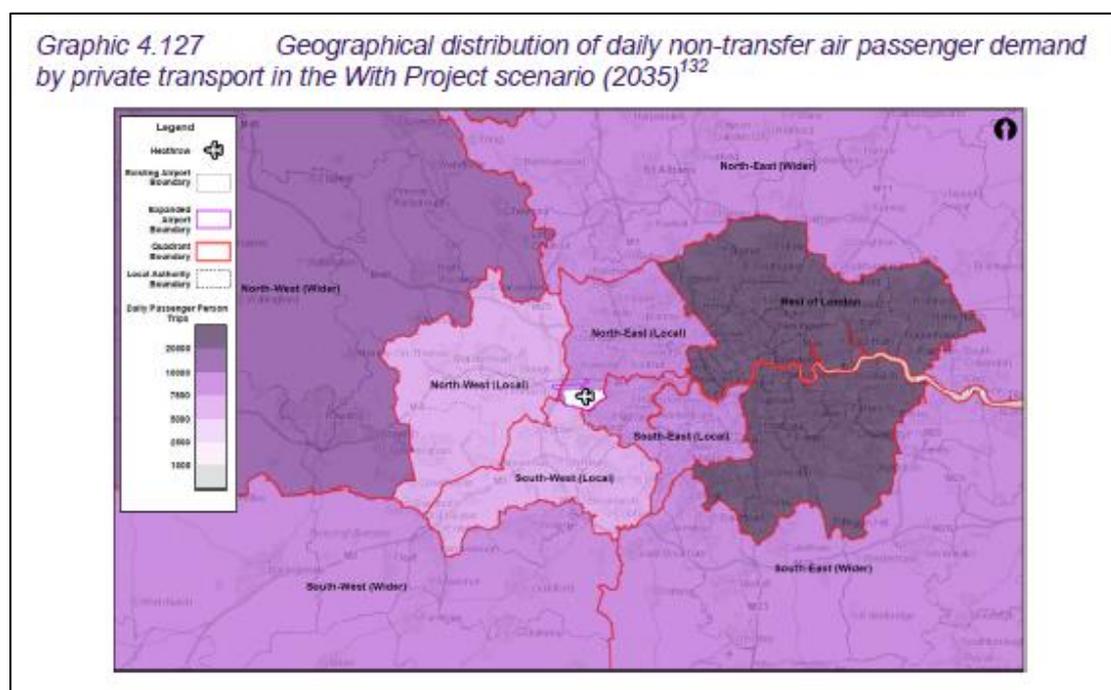
## 11. Car Parking Strategy and Locations

11.1 Paragraph 5.5 of the ANPS requires that the necessary surface access improvements are “delivered in a way that minimises congestion and environmental impacts, for example on air quality”.

11.2 The Preliminary Transport Information Report (Vol 2 – Project Description) states at paragraph 2.7.6 that HAL’s Stage Two consultation proposes the following car parking spaces:

- Eastern Campus (CTA): up to 3,600 spaces
- Terminal 4: up to 10,750 spaces
- Western Campus (T5): up to 4,300 spaces
- Northern Parkway: up to 24,000 spaces
- Southern Parkway: up to 22,000 spaces

11.3 We are concerned that the proposed car parking strategy proposes a substantial number of public and colleague spaces in the Southern Parkway (circa 34% of the total spaces provided). Combined with T4 and the Western Campus, this would provide over half of all spaces on the ‘southern’ side of the airport with access most likely from the M25 (J14/14A). However, HAL’s own assessment is shown on Graphic 4.127 (PTIR Vol3, p115) and is reproduced below which illustrates the distribution of private vehicle trips. This demonstrates that most private vehicle trips to the airport are from the north west, north east and east.



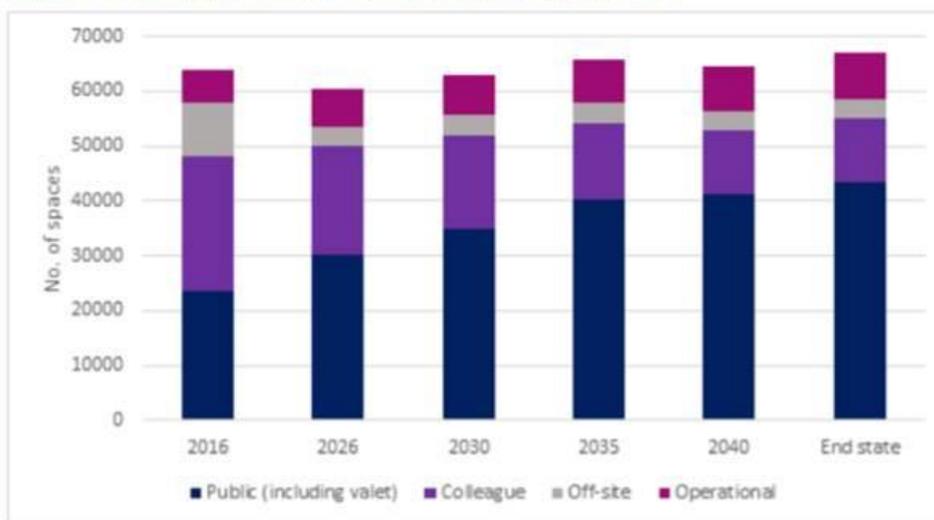
11.4 This imbalance of parking relative to the terminal destinations of passengers means that additional traffic movement will be created by private vehicles

travelling from the north side of the airport to the Southern Parkway. This will create comparatively longer trips on the local and strategic road network. In turn this will lead to greater air quality and noise impacts on local communities than if a greater proportion of car parking spaces were provided to the north, and thus would be contrary to ANPS paragraph 5.5 and ANPS paragraph 5.68.

- 11.5 The Northern and Southern Parkways are proposed on land designated as Green Belt. Paragraph 5.107 of the ANPS confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 5.114 of the ANPS confirms that the applicant should determine whether any part of the proposal would be within Green Belt and if so whether the development may be considered inappropriate. Two multi-storey car parks, each accommodating in excess of 20,000 spaces in the Green Belt, would plainly constitute inappropriate development. Paragraph 5.114 of the ANPS confirms that inappropriate development should not be approved except in very special circumstances. We do not consider very special circumstances have been demonstrated as our proposals enable most of the car parking to be provided to the north of the airport largely on previously developed land, significantly reducing the impact on Green Belt land.
- 11.6 The delivery of 22,000 car parking spaces in the Southern Parkway will require a large multi-storey car park adjacent to the existing residential community of Stanwell Moor. The additional traffic movements and bulky built form of the parking proposed will have a significant impact on existing residential communities to the south of the airport and will negatively impact the amenity of local residents. Heathrow West, with parking predominantly to the north would reduce traffic movements around the airport and the impact of the car parking on local communities.
- 11.7 There is therefore a better car parking strategy that results in less impact on Green Belt and is more geographically focussed to reflect distribution of trips to Heathrow, which in turn reduces the distance that private cars travel on the local and strategic road network. We are therefore concerned that the proposals for the distribution of the car parking set out in the HAL Stage Two Statutory Consultation, creates greater impacts than necessary on local traffic movements and local communities.
- 11.8 We are also concerned about HAL's proposals to effectively take over all current tenanted and off-site parking areas to implement their consolidated parking strategy, with no clarity on precisely how this will be done or its effects. Whilst we understand the need to ensure that the passenger and colleague car parking identified by HAL as being required to operate within the constraints of the ANPS need to be managed and controlled through the DCO, it is not appropriate to do this in a way which effectively prevents existing businesses from being able to continue to operate.
- 11.9 The HAL Car Parking proposals are set out at section 3.4 of the Surface Access Proposals document. HAL identify approximately 67,000 passenger and colleague car parking spaces as being required to ensure that the policy

restrictions in the ANPS can be met but explain that precise car parking numbers will not be known until the submission of the DCO application. This indicative provision is set out at Graphic 3.16 (replicated below) which shows the shift over time from colleague to passenger parking, based on the principle that passengers are more likely to switch to other car-based modes, such as taxis, if car parking is not available, whereas colleagues would be more likely to use public transport.

Graphic 3.61: Existing and indicative future car parking provision



- 11.10 Colleague car parking includes tenanted areas used by direct employees of the Arora Group and its tenants in World Business Centre 3 (WBC3) and the Compass Centre (which include HAL employees).
- 11.11 HAL then state that it will seek to reach agreement with the owners of the remaining colleague car parks to ensure these can also be managed in accordance with their wider needs-based management regime, but in the event that agreement cannot be reached, they propose to seek additional powers in the DCO to provide sufficient control over parking management. If this land is acquired through CPO, HAL state that they could be retained as car parking on a controlled basis or repurposed for other masterplan uses. A Workplace Parking Levy is also suggested as a tool with which HAL could use to help to manage use of existing tenanted car parks.
- 11.12 It is difficult to tell from the information published what HAL propose for the tenanted car parks, particularly the location and number of spaces, which is fundamental to the way in which businesses such as the Arora Group operate.
- 11.13 This approach is also inconsistent with the Preferred Masterplan which states that existing surface level car parking will be moved to, and new parking facilities provided at, two principle multi-storey parking locations (the northern and southern parkway referred to above). Parking areas are also shown on the Illustrative Masterplan (Figure 6.1 in the PEIR). These show six principal areas for car parking around the airport, with the majority in the north and south parkways, none of which include the tenanted parking areas serving Compass Centre and WBC.

- 11.14 The Scheme Development Report includes a section (7) which explains the approach to developing the preferred approach to car parking. This includes a table showing proposed parking distribution (subject to change) and an indicative parking masterplan. The table (7.5) includes 394 spaces in WBC as part of the T1/T2 provision, however, this is not shown on the plan and is a significant reduction from the current number of spaces at WBC (circa 800), despite the land not being included within HAL's draft DCO Limits area. It is therefore not at all clear what HAL propose for the WBC parking, or for other tenanted colleague and passenger car parks owned by Arora. There are also 777 spaces included for Arora car parks in the cargo area, but it is not clear from the plan precisely where this is located.
- 11.15 It can only be assumed from this that HAL would seek to remove a large proportion of parking for existing businesses at Heathrow. If this is the intention, this needs to be made clear and explicitly justified – the Arora Group would be very concerned about their ability to continue to operate from WBC if they lost a significant number of employee parking spaces. HAL would also need to ensure that they carried out appropriate consultation on the future use of that land, if it is not parking. It is simply not adequate to tell current businesses that their car parks could be taken over for some future use, which is not yet identified.
- 11.16 Given the extent of tenanted parking areas, the Arora Group would suggest that the future parking strategy therefore needs to be developed as part of a carefully considered and balanced approach in close consultation with those businesses that are most directly affected. This has certainly not been the case to date. Given the importance of the parking strategy to not only businesses, but communities around Heathrow, the resultant strategy should then be subject to proper and full consultation.

## 12. Consolidation of Rivers into one Corridor

- 12.1 As set out in paragraph 5.184 of the ANPS, decision-making on the water environment (including river habitats, geomorphology and water quality) for the DCO should aim to prevent deterioration in status of water bodies, support the achievement of the objectives in the Thames River Basin Management Plan, and avoid jeopardising the future achievement of good status for any affected water bodies. We are concerned that the proposals to channel the flows of three rivers into a highly constrained channel between the airport 'HAL Western Campus' and the re-aligned M25 will result in a reduction in the geomorphological and habitat quality of the existing surface watercourses. The River Colne currently follows a broadly natural course to the east of the M25, in a relatively unconstrained channel with largely natural bed and banks. The HAL Stage Two proposals require the River Colne to be heavily engineered to include it in the narrow corridor east of the M25 alongside the Twin Rivers (the Duke of Northumberland's River and Longford River, which flow around the perimeter of the existing airport complex). We understand that the proposals rely on a

derogation from the Water Framework Directive which is not in accordance with paragraph 5.184 of the ANPS.

- 12.2 We consider that the proposed river strategy will result in rivers which do not offer any significant opportunities to offset or mitigate the adverse effects on the water environment associated with their further modification, and therefore does not accord with paragraph 5.186. Heathrow West would divert the River Colne to the west of the M25 where it would be possible for the river to follow a more natural, less constrained course with sufficient space for natural adjustment and the development of a wide range of riparian and floodplain wetland habitats, until it could re-join its course in Stanwell Moor. This would also provide greater potential to offset any derogation under article 4.7 of the Water Framework Directive. We do not consider that the HAL Stage Two proposals offer the best alternative for river quality for the expanded airport.
- 12.3 In order to achieve a more naturalised corridor for the River Colne, it is necessary to divert the A3044 to the east, rather than the west of the M25, as currently proposed by HAL.
- 12.4 The HAL Stage Two proposals locate the A3044 to the west of the M25 in a relatively undeveloped area. Locating the A3044 diversion to the eastern side of M25 will also bring it closer to its existing route and the communities it serves and reduce the impact of additional road infrastructure on this part of the Colne Valley, which provides an important break in built development. The east side of the M25 is already substantially urbanised and therefore the location of the A3044 east of the M25 is considered more appropriate than the alternative proposed by HAL.

### 13. Capital costs of expansion

- 13.1 A general principle of the ANPS is that the applicant should demonstrate in its application for development consent that its scheme is cost-efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime (paragraph 4.39). Paragraph 4.3.1 of the Preferred Masterplan states *“there is confidence that we can expand the airport whilst keeping passenger charges close to 2016 levels in real terms”*. No evidence is provided in the consultation to demonstrate that charges to airlines and their passengers can be kept to 2016 rates.
- 13.2 We have responded separately to the CAA’s consultation (in CAP 1819) on the cost of the expansion proposals and believe that there is strong evidence to demonstrate that HAL’s costs are substantial and increasing significantly and can only be managed through introducing competition.
- 13.2 The best way to ensure that costs for airlines and passengers are minimised is through the introduction of competition at Heathrow. Whilst the airport operates as a monopoly there is no incentive to minimise costs. Heathrow West Limited is developing an alternative terminal proposal to be operated competitively with the existing Terminals at Heathrow. In order to fully accord

with ANPS principle to minimise costs, a competitor terminal operator should be incorporated into the airport expansion plan.

- 13.3 Heathrow West requires substantially less land take, provides a more efficient local road layout, and consolidates new terminal provision into a single location, all supporting cost reductions. We will publish more details around our expected costs in due course.
14. **Lack of adequate consultation with Arora as a landowner and appropriate clarity over the use of land to be acquired**
  - 14.1 Arora are a major landowner in the area indicated by HAL to be required for expansion. HAL have met with the Arora Group as a landowner on two occasions (the second of which was 2 days ago) and both of these meetings have been relatively general in terms of precise land required for the expansion and the use of that land. The Arora Group were anticipating that the Stage Two consultation would provide much needed clarity on the precise land holdings required and the way in which HAL proposed to use their land, including whether temporary or permanent acquisition is proposed. This is fundamental in order for Arora to plan the impact of the expansion on its business.
  - 14.2 As a general point, it is not clear from the documents published precisely which land HAL proposes to compulsorily acquire to construct and operate the development consented through the DCO. The plan on page 97 of the Consultation Document shows a Compulsory Purchase Zone (CPZ) and a draft DCO Limits area. Upon looking in further detail, it is apparent that the CPZ includes all residential properties currently anticipated to be required for the project. The DCO Limits area appears to show other land, which covers much of the area needed for expansion, including diversion of roads and rivers and Airport Supporting Development (ASD) which may be required for the construction and operation of the Project. This is hugely misleading – it is not clear to individual landowners whether or not their land will be required and in practice this is likely to include a large proportion of the land, given that it includes land necessary to mitigate the effects of expansion.
  - 14.3 Where Arora Group land is required to deliver elements of the expansion, these should only be compulsorily acquired where the CPO test is met, which would necessarily include Arora Group’s ability to deliver the development proposed on its own land.
  - 14.4 Notwithstanding the representations made in relation to Heathrow West, and subject to the general point above, the Arora Group wishes to raise the following principal comments and objections in relation to some of the land that they own that is required for expansion. These comments are made without prejudice to any future points that Arora Group may wish to make in relation to any proposed CPO powers that HAL may be seeking over land within its ownership, which may include sites not listed below:

- 1. Plot WBC5** – This is the area of land adjacent to WBC4, on Newall Road. This plot falls within Zone R on HAL’s illustrative masterplan. There are inconsistencies in the proposed use of this plot. HAL indicate in the Preferred Masterplan document that this land would be used for a datacentre. The Illustrative Masterplan (Figure 6.1 in the PEIR) shows the land in part industrial, part utilities. The Arora Group submitted an outline planning application to London Borough of Hillingdon (application reference 74351/APP/2018/4098) on 21<sup>st</sup> November 2018 for the use of this site for offices, with a shared access with WBC4 (the adjacent existing office building, currently occupied by Amadeus). The application has not yet been determined but is consistent with policy. The Arora Group object to the use of Plot WBC5 for a datacentre and/or industrial and utilities, on the basis that these uses have not been adequately justified. HAL has identified a number of sites for office development as part of the DCO proposals and therefore offices would be a better use of this land, particularly given the current planning application for the site. It would also negate the need to compulsorily purchase this land. HAL confirmed in the latest meeting with Arora Group that this land was no longer proposed to be included in the masterplan; however, this consultation response is based on the information in the public domain.
- 2. Land adjacent to Heathrow Skills Academy** – This is the area of land in front of the existing Heathrow Skills Academy which is currently in use as a staff car park to serve the World Business Centre. This plot falls within Zone R on HAL’s illustrative masterplan. Figure 6.1 in the PEIR shows this for Airport Ops and illustrative masterplan shows the land as being used for an expansion of the Skills Academy. Arora accepts the need to expand the skills academy, but there is still insufficient information on precisely what land is required, why the land would need to be acquired to deliver it, whether temporary or permanent rights are sought and impact on displaced uses.
- 3. Compass Centre** – This includes the offices and car park currently occupied by HAL as their headquarters and as their staff and visitor car park. This plot falls within Zone A on HAL’s illustrative masterplan. Figure 6.1 in the PEIR shows this for Airport Operations and the illustrative masterplan doesn’t indicate precisely what the land would be used for (it shows the buildings in their current configuration, but then the parameter plan sets proposed indicative heights, which suggests some form of development). There is insufficient information on precisely what land is required, whether temporary or permanent rights are sought and impact on displaced uses.

4. **Sealand Road** – This is an existing multi-storey car park to the south of the airport. There is an application for car parking (application reference 65688/APP/2018/1751) currently with LB Hillingdon for determination and ongoing litigation regarding a dispute as to whether the parking proposed falls within the overall cap of car parking spaces specified in the T5 consent. The Arora Group maintain that this is an appropriate location for car parking, that it falls within the T5 cap and that it should continue to be shown for car parking in the future.
5. **Northumberland House** – This is an existing car park to the south of the airport that is currently in use as a HAL staff car park. We note that HAL’s Figure 6.1 appears to show the Northumberland House plot as falling within an area for future parking to serve T4, but it is not clear as to whether this is new provision, or retention of the existing, Arora Group owned, car park. If redevelopment of the parking is proposed, Arora Group has a proven track record of delivering parking around the airport.
6. **Sofitel, T5** – We note that HAL propose that Sofitel remains in the Stage Two consultation proposals. Under Heathrow West, the Sofitel site is redeveloped to enable a more efficient development of the western campus and the delivery of a high quality public transport interchange. Under HAL’s proposals we would be concerned about continuity of operation during the construction proposals and that any impact from noise and construction disruption is sufficiently mitigated.

14.4 The Arora Group met with HAL on 11<sup>th</sup> September 2019 and would be happy to meet with HAL again to provide further clarity on each of the above areas, including providing plans to identify the landholdings referred to above.

14.5 The Arora Group owns substantial areas of additional land within the boundary of the land required to deliver the runway, particularly sites under the footprint of the eastern extent of the runway, within Longford and to the west of T5. Whilst the Arora Group does not object in principle to the use of these areas, we would ask HAL to engage with us closely on precise land required within these areas, the purpose for which HAL intend to use it and the precise rights sought.

## 15. Consultation Feedback

15.1 We respond directly to the consultation questions set out in the Heathrow Airport Stage Two Statutory Consultation below:

Please tell us what you think about any specific parts of our Preferred Masterplan or the components that make up the masterplan.

We support the expansion of Heathrow Airport including the Northwest Runway and the proposals for the cargo area. However, as set out in our comments above, we have concerns about a number of the features within the Preferred Masterplan:

- The provision of terminal capacity over two buildings T5X and T5XN, rather than a single terminal building;
- The provision of a large car park to the south of the airport, the Southern Parkway;
- The extent of the diversion of the A4 road;
- The position of the diverted Colne River to the east of the M25;
- The position of the diverted A3044 to the west of the M25;
- The lack of clarity on the precise uses intended in the preferred masterplan and inconsistencies between documents.

Do you have any other comments on our Surface Access Proposals?

The Surface Access Strategy is not sufficiently developed at this stage to enable Heathrow West and Arora Group to provide meaningful comment. Given the impact of the SAS on business and communities around Heathrow Airport, we suggest that a proper and full consultation on the more detailed strategy is required at an appropriate stage.

The proposed car parking is poorly located given the known direction of travel of vehicles to the airport, which is predominantly from the north. More detailed comments are set out above.

We support a reduction in colleague parking across the airport as a whole to support the delivery of the public transport modal shift targets in the ANPS; however, there is also a lack of clarity on HAL's precise parking strategy and proposals, inconsistencies with the published information and a lack of willingness to engage with existing operators of tenanted car parks to devise a strategy in collaboration.

Please tell us what you think of our proposals and how we could further encourage or improve public transport access to the airport.

Further detail is required on the Public Transport Interchange between Terminals 5 and 5X, including how this can be satisfactorily delivered with the existing MSCP still in place. As set out above, the provision of public transport focussed terminals to the west of the airport would encourage the modal shift required by the ANPS. The current proposals do not provide sufficient information to confirm that the objectives of the ANPS can be met.

Please tell us what you think of our construction proposals and the ways we are proposing to minimise effects on communities and the environment.

We set out our concerns on the construction proposals above and consider that the proposals put forward by HAL cover too wide an area over an unnecessarily prolonged timescale and therefore do not minimise effects on communities and environment. This is because they disperse construction sites over a wider area than would be necessary in the Heathrow West proposals, with resultant impacts on Green Belt, the local community and land take, and extend the construction period over an excessively long period. Heathrow West has the flexibility to construct the terminal development to serve the expansion earlier than envisaged in the HAL proposals.

Please tell us what you think about our development proposals and the measures proposed to reduce effects in your area.

We have set out our concerns relating to the Proposed Masterplan in respect of the extensive area of land required, which we do not consider is justified given the alternative proposal being put forward by Heathrow West.

Please tell us what you think about our proposals to manage the environmental effects of expansion.

We are concerned that insufficient information has been provided to assess the environmental effects as part of the Preliminary Environmental Information Report, as set out below.

The landscape strategy contained within the preferred masterplan document identifies the primary functions of open space parcels that make up the landscape / green infrastructure strategy. However, the proposals lack sufficient detail to explain why the open space parcels have been selected for a particular function(s). For example, European Protected Species mitigation areas have been identified without reference to any particular species. It is therefore difficult to draw geographical connections between the effects reported in the PEIR and mitigation proposed as part of the landscape strategy/ green infrastructure strategy.

As previously noted, the proposed river strategy will result in rivers which do not mitigate the adverse effects on the water environment. The Water Environment chapter of the PEIR makes reference to water quality monitoring programmes (e.g. 111 river monitoring locations, 24 lakes and 700 groundwater quality / level monitoring boreholes). There is no detailed annex outlining the results of these monitoring programmes. We believe this information should be made available at the earliest opportunity for further and fuller consideration of effects on the water environment.

We consider that airlines and airline users should be scoped into the Socio-economic assessment as receptors for the Environmental Statement to support the DCO Project, as effects on these receptors will differ depending on the nature

of the DCO Project. The Heathrow West proposals will deliver greater competition which will impact airline profits and passenger costs and therefore a consideration of the economic impacts on airlines and passengers should be included within the assessment.

Please tell us what you think of our proposals for maximising new jobs and training. Are there any other ways that we can maximise skills and training opportunities to benefit our local communities?

As an established local employer, we firmly believe in creating opportunities for local people. As part of collaborating with HAL on Heathrow West, we would like to understand more about HAL's proposed strategies and programmes and how we can work collectively to maximise benefits for local communities.

At this stage, there is insufficient detail on the proposed jobs and training strategies to provide further meaningful comment.

Please tell us what you think about our approach to addressing effects on the historic environment, including any particular proposals you would like us to consider.

We have provided comments above on the potential to reduce the effects on the remaining part of Harmondsworth Conservation Area and the Great Barn through amending HAL's proposals to divert the A4 to the north and proposing instead a local service road to Saxon Lake Industrial Estate, which could be a single track non-through road which would have a significantly lesser effect on these heritage assets.

The consultation documents do not include the Historic Landscape Characterisation Report (s) and Historic Area Assessment Reports which were referenced as being prepared within the HAL DCO Project scoping report. This information should be made available at the earliest opportunity for further and fuller consideration of the effects on the historic environment.

Please tell us what you think about our interim Property Policies, including our general approach to buying properties and land and our approach to compensation, including our discretionary compensation offers.

As set out above, the proposals include too much land for acquisition as the objectives of the ANPS can be met in a smaller area. The Arora Group, who support the Heathrow West proposals, are a major landowner within the Heathrow expansion area.

The Arora Group support the expansion of Heathrow and the provision of a third runway; however, the Heathrow West proposals demonstrate that an alternative scheme exists which delivers significant benefits, but with less acquisition of private land.

For Arora Land to be acquired to facilitate the delivery of the Northwest runway, the CPO test needs to be met. We support the principle of the provision of the runway, however, we would object to the acquisition of land for the runway, unless the expansion proposals incorporate the Heathrow West scheme, on the basis that there is an alternative that uses less land and no compelling case to acquire all of the land identified by HAL to deliver Heathrow expansion.

Do you have any comments on what we think will need to be contained in our DCO and do you have any views on anything else the DCO should contain?

The DCO proposals should be amended to include the Heathrow West proposals as they represent a more efficient layout which will require less land to meet the objectives of expansion. Heathrow West will be consulting on our proposals in early 2020.

There is also a lack of clarity in the consultation documents on precisely what land is required for the DCO. This includes potentially misleading information, which on face value could be interpreted as only those properties in the CPZ being required for acquisition.

Please give us your feedback on this consultation (such as the documents, website and events)

We have raised concerns in our response above regarding the adequacy of the consultation and the difficulty in navigating the consultation website. There are also a number of inconsistencies within the consultation documents particularly in terms of terminology between consultation documents, for example the Scheme Development Report and PEIR, which include different figures for Airport Supporting Development. These inconsistencies make it difficult to understand the development which has been assessed as part of the PEIR.

The proposals set out that the intention to use Rochdale Envelope principles to define parameters for development, within which expansion can occur. As noted in Chapter 5 Vol 1 PEIR the Planning Inspectorate expects that as part of the Rochdale Envelope approach *“The assessments in the ES should be consistent with the clearly defined parameters and ensure a robust assessment of the likely significant effects”*. Paragraph 5.4.9 is unclear as to which chapter the parameters of the built development are defined (chapter 6 or the topic chapters). Chapter 6 and Figures 6.6 onwards set out parameters but in doing so rely on a number of illustrations and “illustrative” features. It is therefore unclear what is proposed and whether a robust assessment has been undertaken.

## 16. Conclusions

- 16.1 We have outlined above our objections to the proposals which are being consulted on through HAL’s Stage Two consultation. These can be remedied by adopting the Heathrow West proposals.

- 16.2 However, and in any event, there is insufficient information in the HAL Stage Two consultation to determine the full impact on our properties and businesses at the airport.
- 16.3 Heathrow West wish to engage productively and collaboratively with HAL on our alternative proposals, but only as a truly joint party to enable the full benefits of competition to be realised.

**Carlton Brown**

CEO Heathrow West and CFO the Arora Group