

HEATHROW AIRPORT EXPANSION-CONSULTATION FEEDBACK

This consultation response is provided on behalf of the Middlesex Branch of the Inland Waterways Association (MBoIWA). The Inland Waterways Association is a membership charity that works to protect and restore the country's 6,500 miles of canals and rivers.

The Middlesex Branch of the Inland Waterways Association covers the area of seven boroughs in west London, South Bucks District Council, Slough Borough Council and the Old Oak & Park Royal Development Corporation. Navigable waterways within the Branch area include the Grand Union Canal between Brentford and Springwell, the Paddington Arm between Southall and Westbourne Green and the Slough Arm of the Grand Union Canal.

Our principal interest in the Heathrow Airport expansion proposals is the impact the Project will have on the Grand Union Canal and the Slough Arm. Both canals are within the Colne Valley Regional Park and we are concerned that the airport expansion will cause significant harm to the Park.

Our responses to the Consultation questions are set out below:

INLAND WATERWAYS ASSOCIATION-Middlesex Branch Heathrow Airport Expansion Consultation Response

MASTERPLAN

Question 1. Please tell us what you think about any specific parts of our Preferred Masterplan or the components that make up the Masterplan.

MBoIWA Response.

We object to the spatial layout of the expanded airport. The proposed northwest runway, additional facilities and access arrangements together with the diversion of existing highway infrastructure will result in the permanent loss of 900 acres of land in the southern part of the Colne Valley Regional Park. The loss of this land will bring unprecedented detrimental change to the Colne Valley Regional Park and will affect the ability of the area to function as a park. The Colne Valley Regional Park provides a wildlife link between the Thames Basin and the Chilterns. The 'narrowing' of the Park by the expanded airport will disrupt the ecological connectivity of the Thames and Chiltern landscapes. Some 13 miles of the Grand Union Canal and the Slough Arm run through or alongside the Colne Valley Regional Park and reduced connectivity of the Park will cause significant harm to the natural environment of these waterways.

Question 2. Please tell us what you think about the sites we have identified for buildings and facilities we are proposing to move.

MBoIWA Response.

MBoIWA object to the sites identified for the Railhead area to the south of the M4 and the Freight forwarding warehouses to the west of the airport. These sites are within the Colne Valley Regional Park and will be detrimental to wildlife within the Park and along the waterway corridors to the north (refer to response to Question 1).

Question 3. Please tell us what you think of our boundary design proposals to manage noise and the effects on views around the boundary of the expanded airport.

MBoIWA Response.

MBoIWA expresses no particular view on the boundary design proposals to manage noise and the effects on views around the boundary of the expanded airport.

Question 4. Please tell us what you think about our development proposals and the measures proposed to reduce effects in identified areas.

MBoIWA Response.

We have no comment to make about the ten identified areas as the navigable waterways (the Grand Union Canal and the Slough Arm) are outside the core area surrounding the airport and the Consultation documents contain no specific local assessment of these areas. IWA will refer in its response to the two canals in relation to each topic.

CONSTRUCTION

Question 5. Please tell us what you think of our construction proposals and the ways we are proposing to minimise effects on communities and the environment.

MBoIWA Response.

IWA is concerned that construction work will cause substantial disruption and impact on surface access in areas adjacent to the Slough Arm and Grand Union Canal including Langley, Iver, West Drayton, Uxbridge, Denham and Rickmansworth over 10 years or more from 2022.

FUTURE OPERATIONS

Question 6. Please tell us what you think of our runway alternation proposals, in particular we would like to know if you think we should alternate the runways at 2pm or 3pm.

MBoIWA Response.

IWA expresses no particular view on the runway alternation proposals other than that the mixed mode runway allocations will result in less predictability for residents wishing to access open space for recreational purposes without experiencing intrusive aircraft noise. The current Week 1 and Week 2 runway operations provide predictable relief for the neighbourhoods around Heathrow and are largely understood by local communities.

Question 7. Please tell us what you think of our preferred proposal for a ban on scheduled night flights, and/or whether you would prefer an alternative proposal..

MBoIWA Response.

We are concerned that the introduction of a night flight ban will leader to the transfer of more flights into the sensitive 6am to 7am period.

Question 8. Please tell us what you think about our proposals for managing Early Growth.

MBoIWA Response.

We are concerned that the Early Growth strategy is reliant on the introduction of Performance Based Navigation (PBN) and that curved PBN flight paths will add to noise impact in the Colne Valley area.

SURFACE ACCESS

Question 9. Please tell us what you think of our proposals (for surface access) and how we could further encourage or improve public transport access to the airport.

MBoIWA Response.

West London's roads are already heavily congested and increased background traffic, construction traffic and business growth traffic from resulting from the expansion of Heathrow will impair access to the waterways for recreational use by walkers, cyclists and boaters. The targeted modal shift from road to public transport is not being subsidised by Heathrow and will not permeate to the areas needed for access to the waterways.

Question 10. Please tell us what you think about our proposals for the Heathrow Ultra Low Emission Zone and Heathrow Vehicle Access Charge as ways to manage congestion and air quality impacts.

MBoIWA Response.

The Heathrow ULEZ and VAC are unlikely to be sufficient to achieve the modal shift to public transport that is needed.

Question 11. Do you have any other comments on our Surface Access Proposals?

MBoIWA Response.

We have no other comment to make about the surface access proposals.

PRELIMINARY ENVIRONMENTAL INFORMATION AND MANAGING THE EFFECTS OF EXPANSION

Question 12. Please tell us what you think about our proposals to manage the environmental effects of expansion.

MBoIWA Response.

The proposals covering noise, surface access, air pollution, and carbon emissions do not recognise the already high cost of environmental harm caused by Heathrow Airport. The management interventions to mitigate the harm rely on lax standards and ineffective enforcement.

Air Quality

Question 13. Please tell us if there are any other initiatives or proposals that we should consider in order to address the emissions from airport related traffic or airport operations?

MBoIWA Response.

The Consultation Documents provide analysis of the environmental impacts on local neighbourhoods immediately surrounding the airport but no analysis is given for those areas adjacent to the Grand Union Canal. We note however from the documents that Richings Park, approximately 400 metres to the south of the Slough Arm, will experience the smell of aviation fuel during certain weather conditions. We are concerned that this impact could potentially also affect the canal and there are no remedial measures that could address this. Furthermore we understand that the proposed mitigation measures to address emissions from the airport are focused on NO₂ and largely ignore ultrafine particulates from aircraft above 1,000 feet, which have the potential to cause dangerous pollution over a much wider area.

Health and Well Being

Question 14. Please tell us what you think about our proposals to help health and well being. Are there any other proposals that you think we should consider to address the effects of the Project on the health and wellbeing of our colleagues, neighbours and passengers?

MBoIWA Response.

The Grand Union Canal passes through the densely populated town centres of Hayes, West Drayton and Uxbridge and at its nearest point the canal is approximately 2.5km from the proposed northern boundary of the expanded airport. In these urban areas the waterway offers a green refuge, and access to a natural environment with lower exposure to air pollution and noise. There is growing evidence that open space and access to water (green/blue space) is associated with increased activity, decreased levels of stress and improved mental health. We are concerned that increased noise and pollution from an expanded airport and the associated airport traffic growth will reduce usage of the waterway as an important recreational amenity and the health and wellbeing benefits of the canal will be lost. As identified in the Consultation documents and the Preliminary Environment Information Report (PIER) the expansion of the airport will be detrimental to health physical health and wellbeing. Measures for reducing these effects are however limited to property and compensation zones in the close vicinity of the expanded airport and will not assist the communities of Southall and Hayes immediately outside these zones. The Consultation documents make reference to a Community Fund to mitigate environmental and social residual effects but the documents provide little detail of the scope of the funding or the communities that would be considered eligible for funding.

Noise Insulation Scheme

Question 15. Please tell us what you think about our noise insulation schemes.

MBoIWA Response.

Insulation is of no effect outdoors the proposals for mitigation and compensation will do nothing to alleviate the detrimental impact of noise on walkers, cyclists, anglers and boaters and boat residents on the Grand Union Canal and Slough Arm.

Question 16. Please tell us what factors are most important as we develop our proposals for noise management, in particular our proposals for the design and implementation of a noise envelope.

MBoIWA Response.

The criteria for defining a noise envelope appear to be at a preliminary stage and we therefore have no comment to make.

Economic Development

Question 17. 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?

MBoIWA Response.

We have no comment to make about proposals for maximising new jobs and training.

Historic Environment

Question 18. 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.

MBoIWA Response.

The Grand Junction Canal (which later became the Grand Union Canal) was completed between Brentford and the Midlands in 1805. The Sough Arm of the Grand Union Canal was built in 1882. Both canals are of important historic significance and many sections of the waterway are within Conservation Areas. Although the canals are not bodily changed by the airport expansion proposals we consider that potential noise and pollution effects will diminish the quiet enjoyment of the historic settings of the canals.

ENVIRONMENTALLY MANAGED GROWTH

Question 19. Please tell us what you think of our proposed approach to manage the future growth of the airport within environmental limits. Is there anything else we should consider as we develop the framework and its potential limits?

MBoIWA Response.

We support limits being placed on the environmental impact of surface access (traffic), air quality, noise and Carbon emissions but we consider the proposed framework and limits set against the control of growth will not be strictly enforceable and open to challenge.

COMMUNITY FUND

Question 20. Please tell us what you think about our proposals for the Fund, including what it is spent on, where it is spent, and how it should be funded and delivered.

MBoIWA Response.

We have responded to the general principle of a Community Fund in our answer to Question 14. We are concerned that eligibility for funding will be limited to areas close to the airport. We consider the negative impacts of the airport expansion will be more widely felt across the entire area of the Colne Valley Regional Park and in the communities close to the Grand Union Canal and Slough Arm. Potential community funding should be widened to incorporate these areas and should include measures to create new open space, improve accessibility and enhancement of the waterway corridor.

PROPERTY AND COMPENSATION

Question 21. 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.

MBoIWA Response.

We have no comment to make about the interim Property Policies.

DEVELOPMENT CONSENT ORDER

Question 22. Do you have any comments on what we think will need to be contained in our Development Consent Order (DCO) and do you have any views on anything else the DCO should contain?

MBoIWA Response.

A definitive flight path design and not indicative design should be specified prior to the application for a DCO so that the noise impact on the Colne Valley Regional Park and areas to the north of the airport can be properly prescribed by the Development Consent Order. A declared maximum operational capacity of the airport (number of flights and passengers) should be contained in the DCO.

GENERAL COMMENTS

Question 23. Do you have any other comments in response to this consultation?

MBoIWA Response.

The Heathrow Expansion Preferred Masterplan requires three rivers (Wraysbury River, River Colne and Bigley Ditch) to be combined to the north of the airfield to pass under the new runway in a single covered channel. The Duke of Northumberland's River and the

Longford River will also pass under the runway in a parallel covered channel. The consultation documents show that these combined covered river corridors will receive a limited amount of daylight from two roof voids located between the taxiways to the south of the new northwest runway. We are concerned that a fuel spillage or fire fighting foam could enter these openings between the taxiways causing pollution of the rivers that could potentially threaten the ecology of the Thames.

The Consultation Document confirms that Preliminary Environment Information Report (PEIR) expects significant negative effect as a result of infilling of lakes, resulting in loss of open water and associated habitat. PEIR also predicts significant negative effects resulting from the proposals to pass rivers beneath the new runway in the proposed covered river corridor. The reduction in habitats and biodiversity in these areas will be detrimental to wildlife connectivity into the Colne Valley and Grand Union Canal corridor. The measures identified for reducing the effects of the Heathrow expansion on the water environment will be insufficient to mitigate the harm to the natural environment.

Question 24. Please give us your feedback on this consultation (such as the quality of the documents, website and events).

MBoIWA Response.

The IWA objects to the use of maps within the Consultation Document that are of different scales and coverage which make proper comparison between the existing situation and the preferred masterplan impossible.

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