



Wandsworth Council

Place Division
The Town Hall
Wandsworth High Street
London SW18 2PU

Email: planning@richmondandwandsworth.gov.uk
Web: www.wandsworth.gov.uk

Date: 01 October 2025

BY EMAIL ONLY

heathrowairport@planninginspectorate.gov.uk

c/o Hannah Terry
Secretary of State
Environmental Services Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Ms Terry,

PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) – REGULATIONS 10 AND 11

APPLICATION BY HEATHROW AIRPORT LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE HEATHROW EXPANSION (THE THIRD RUNWAY)

I refer to the above submission made under Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which includes the submission of a Scoping Report prepared in advance of the submission of an Environmental Statement. The EIA Regulations set out that:

“Where the proposed application for an order granting development consent is an application for EIA development, the applicant must, at the same time as publishing notice of the proposed application under section 48(1), send a copy of that notice to the consultation bodies and to any person notified to the applicant in accordance with regulation 11(1)(c).”¹

I write in response to the statutory consultation correspondence dated 3rd September 2025 carried out in relation to the Environmental Impact Assessment Scoping Report (SR) concerning the above development proposal. Although this proposal would not be

¹ The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Section 13: [The Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#)

located within the London Borough of Wandsworth, it has been classed as a Nationally Significant Infrastructure Project and would therefore require a Development Consent Order ('DCO') to be determined by the Planning Inspectorate on behalf of the Secretary of State. This letter therefore constitutes the Wandsworth Borough Council's response to the Scoping Report Addendum which has been prepared by Heathrow Airport Limited ('HAL'). HAL have resumed the pre-application phase for its proposed DSO application for a Nationally Significant infrastructure Project ('NSIP') now referred to as 'Heathrow Expansion' which was previously underway in 2018.

The expansion includes the remodelling of the current runways and four terminals by including a third runway, new terminal, apron and taxiway infrastructure. Further infrastructure changes are to be made to the M25 (between junctions 14, 14a and 15) and the replacement and re-routing of local roads such as the A4 and A3044.

The Council's Policies on Heathrow Airport

Heathrow Airport is less than ten miles away from the London Borough of Wandsworth and its proposed expansion is highly likely to affect the borough, including by impacting air quality and levels of noise due to additional flights, passenger and freight journeys. The London Borough of Wandsworth's Local Plan (2023), in line with the Mayor of London, strongly opposes any development that harms residents' amenities through increased noise and air pollution. The very severe environmental impact that the airport has at a local level in terms of Noise and Air Quality on our community as well as nationally in respect of Carbon use and Climate Change is therefore of significant concern.

The Council's positions on sustainability and protecting the amenities of the borough's residents is set out in the Wandsworth Corporate Plan 2022 – 2026 and the Wandsworth Local Plan 2023, and was recently [restated by the Leader](#). The Council remains deeply concerned about the climate impact of any expansion and believe that it would have significant impacts on residents' lives and be incompatible with the UK's ability to meet the carbon reduction targets it has set for itself.

A careful review of the expansion proposals as set out confirms that expansion will add to the already unacceptable environmental burden that the airport imposes on wide areas of the Borough and its residents. A number of concerns and questions arise from a review of the consultation. These are summarised below and incorporated into the proforma response.

Conclusion

In summary, this is a highly complex consultation due to the sheer volume of material presented for stakeholders to review and provide meaningful comment. The Council are strongly of the view that the current scoping underestimates both the scale of climate impacts and the policy conflicts inherent in expansion. Without a clear demonstration of alignment with statutory carbon budgets, local climate emergency declarations, and London Plan sustainability policies, the project cannot be considered acceptable in principle.

We expect that ongoing detailed discussions with Heathrow Airport will continue whilst the EIA is undertaken, and as environmental implications come to light. This is especially relevant as proposals are developed and amended through the pre-application and consultation process.

The Council would formally request that receipt of this response is confirmed by The Planning Inspectorate. The following email address (not bcc) should be used as primary points of contact for further correspondence to ensure that the Development Management Teams are reached directly:

planning@richmondandwandsworth.gov.uk

The statutory consultee response is provided without prejudice to any actions the Council may take as landowner should the need arise.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Nick Calder', with a stylized circular flourish at the end.

Nick Calder
Head of Development Management (Wandsworth)
Serving Richmond and Wandsworth Councils

London Borough of Wandsworth Comments 1st October 2025
Heathrow Airport Third Runway Expansion
EIA Scoping Report Addendum (Expanding Heathrow) (ref. 10000-XX-SY-XXX-100020)
Chapter 1: Introduction
<u>Paragraph 1.4.5 – NOTE</u> – The Scoping Report does not include local planning policies but states that they would not change the scope of the EIA and that they are not documented here. The applicant confirms that the ES will set out details of all local planning policy relevant at that time to the EIA. This is agreed, however reference should still be made to policies from the Local Planning Authorities which are impacted by the proposals.
Chapter 2: Description of existing site and surrounds
<u>Paragraph 2.1.5 – NOTE</u> – This paragraph states that there have been changes to the DCO Project boundary since the 2018 EIA Scoping Opinion was adopted. Figure 2.1 shows the boundary presented within the 2018 EIA Scoping Report, and that of the draft DCO Order Limits boundary referred to in this EIA Scoping Addendum. This does not include LB of Wandsworth and so there is no comment on this boundary.
Chapter 3: The DCO Project
<u>General comments –</u> 1. For the purposes of this EIA Scoping Addendum, no preferred masterplan has yet been fixed for the purposes of the DCO Application, and multiple design options remain under active consideration. As such, there is little specific to comment on as at this stage as the approach only deals with impacts on a restricted area around Heathrow. The proposals /masterplan appears very outline at this stage.

Chapter 4: Approach to the EIA including EIA Scoping

General comments –

Paragraph 4.5.1 – **COMMENT** – Heathrow note that in 2018 it was acknowledged that the parallel Airspace Change process was likely to complete after the DCO application, and that indicative flight paths or design envelopes might need to be used in the ES to assess effects such as noise and air quality.

Paragraph 4.5.2 – **COMMENT** – The applicant notes that on 2 June 2025 it was announced that the UKADS is to be established to lead the centralised airspace designs for London airspace, and (at 4.5.6) Heathrow no longer sponsors or leads the process, and that where final designs are not available, the EIA will adopt appropriate scenarios or design envelopes. In other words, Heathrow's Airspace Change flight paths options are now very well developed (unlike in 2018), and the 169 shortlisted flight paths (or system options compiled from those flight path options) are expected to be handed over to UKADS as Initial Options for the single ACP that will include the DCO project. This is reflected in Heathrow's 3rd runway launch documentation.

Chapter 5: Air Quality and Odour

General comments –

1. Concerns have been raised over the response timeframe and lack of adequate time to buy-in any specialist consultancy, where this is necessary.
2. Paragraph 5.4.2 – **COMMENT** – this sets out that the EIA Scoping Report does not set out a detailed methodology for assessing ecological habitats. This should be **SCOPED IN**.

Summary of main concerns for air quality and effects on human health regarding the proposed EIA scope and methodology:

The submission should:

- Demonstrate both air quality neutral and air quality positive. The proposal lies within the London Borough ('LB') of Hillingdon's AQFA and the AQMA's of surrounding boroughs, such as LB of Richmond upon Thames, LB Wandsworth, LB Hounslow and LB Ealing's. In the last decade, all local authorities, county council's, national government and the Mayor have strived to reduce emissions. This development cannot be permitted to undo any of this work, and as a major development it should contribute to improved air quality.
- As this development site lies within Greater London. The proposals must demonstrate compliance with all aspects of the London Plan 2021 and take into account the future Draft London Plan.
- Outline any increase in pollutants from road transport and aircraft emissions as a direct result of the proposed increase of 276,000 flights per annum (from the existing cap of 480,000 ATM's, agreed at the T5 Enquiry to 756,000 ATM's) increasing the number of passengers to around 150,000,000 per annum using the most relevant updated information e.g. Including the London Atmospheric Emissions Inventory 2022
- Make clear the proposed future cap on ATM's/ passenger numbers. Historically this cap has been long debated. No numerical cap is given (suggested increases only) which would be unacceptable to surrounding communities and LA's.
- The ANPS (June 2018) accepts that aircraft emissions do impact beyond the airport boundary. A quantification in the draft ANPS February 2017 identified aircraft movements as contributing around 14.3% NOx (baseline 2013) at nearby roadside locations. The designated ANPS 2018, which had an updated baseline (baseline 2015) identified aircraft movements contributed 17% NOx (Oxides of Nitrogen) This demonstrates aircraft movements are an increasing source of air pollution outside of the airport boundary and cannot be dismissed so lightly. With London working hard to reduce roadside emissions, aircraft are likely to represent a more significant percentage of overall pollutants. Using updated baseline data, the DCO should provide an assessment of the contribution of aircraft emissions to total roadside emissions, including trend data for transparency.

- Heathrow lies around 11km from Wandsworth Borough. Both are overflowed on a daily basis by aircraft either arriving or departing the airport. These flights generate significant pollution emissions at a height of around 1,200-1,500 ft (400-500m). The Addendum claims aircraft emissions have limited impact on ground-level pollutant concentrations beyond the Airport boundary. No source apportionment information at receptors has been presented to support this statement, and no evidence has been presented to demonstrate and quantify the "limited impact" claimed. In fact, solar heating during daylight hours creates convection that circulates all emissions vertically throughout a layer with ceiling around 5000ft/1500m by mid-afternoon. Aircraft emissions at 1200-1500ft (400-500m) altitude occur well within this layer. Vertical mixing timescales can be 10-20 minutes, so quicker than emissions are dispersed downwind. Air quality modelling must therefore use a modelling framework capable of accurately diagnosing the effects of boundary layer mixing as well as horizontal dispersion. The DCO should provide this.
- The borough is currently outside the HAL defined air quality "Core Assessment Area" which is delineated as being 11km x 12km. This is inadequate and unacceptable. The detailed air quality assessment should include all the areas where Heathrow expansion impinges on the surrounding environment.
- This is supported by the Planning Inspectorate (PINS) in its DCO scoping opinion (Table 7.3, point 10) which states that an arbitrary limit as proposed (11km x 12km) to the assessment area based upon previous studies should not be applied. PINS state that "The Proposed Development is more extensive and covers a wider geographical area and that the model extent should be defined by the area over which significant air quality effects may occur". The Core Assessment Area must therefore be reviewed.
- The Addendum attempts to justify its use of an 11km x 12km core assessment area by reference to previous studies undertaken by HAL and by the Airports Commission. However, this compares 'apples with pears' as the Airports Commission Air Quality study was strategic in nature and used to compare impacts between different airport location options. Both the PEIR, and any following DCO application, is required to present an assessment of a specific proposed development in a specific location. The Heathrow expansion scheme has the potential to impact on a substantial population of people and should be subject to a more rigorous approach.
- Transport benchmarks for air quality neutral are not generally applied to airports, not even relating to retail, restaurant or associated airport structures. This does not mean they should not be properly assessed. The significant additional transport emissions likely from all aspects of this development both during the construction and operational phases must be accurately assessed and mitigated.
- The DCO must outline how the surface access strategy (EIA 2018 5.10.12) will be updated and meet targets set out in the revised draft ANPS on public transport mode share. 5.10.2 states "*at least 50% of surface access passengers arriving or departing from Heathrow by public transport in 2030 and at least 55% of surface access passengers arriving or departing from Heathrow by public transport in*

2040), colleague car use reduction (25% reduction of all colleague car trips by 2030 compared with 2013 levels and 50% reduction of all colleague car trips by 2040 compared with 2013 levels) and the commitment to no increase in Heathrow-related traffic". This must be re-assessed and updated.

- The DCO must outline how the surface access strategy (EIA 2018 5.10.14) will be updated, in particular points 1 and 2 (1. *Putting Heathrow at the heart of the rail network* and 2. *Creating a public transport focused airport*).
- The DCO must outline incentives and encouragements to be given for increased use of sustainable transport by all sectors during both construction and operational phases.
- The DCO must provide targets for sustainable transport and SMART (specific, measurable, achievable, reportable and target driven) travel plan policies for all users of the new expanded airport once operational including but not limited to suppliers, customers (both freight and airline passengers), services and staff, as per EIA 2018 paragraph 5.10.17. Paragraph 5.10.17 further states "*In later years, and as the numbers of passengers increases with expansion, it is likely that there would be a growing emphasis on discouraging unnecessary highway travel and encouraging as many people as possible to use public transport*". How would this be achieved and what penalties would be applied for failure?
- The DCO must outline how freight capacity would be increased but the number of freight journeys reduced as per EIA 2018 5.10.33 which states "*Heathrow (would) seek to double freight handling capacity, but minimise the number of individual freight journeys on the road network surrounding Heathrow, therefore limiting their contribution to pollutant concentrations.*" Please demonstrate how this would be achieved what penalties would be applied for failure.
- London Heathrow sits within LB Hillingdon's AQFA. All road transport within the AQFA should be zero emission to reduce impacts on AQ both within the airport and on the surrounding areas.
- The DCO must outline what steps will be introduced to make the new development air quality positive.
- The DCO must include the measurement and assessment of ultra fine particles (PM1 and below). New evidence is emerging which show high concentrations of ultra fine particles under both take-off and landing flight paths effecting large swathes of surrounding areas up to and including London (20 km). There is much evidence of significant harm to health from these tiny particles. How will these be assessed and mitigated?
- The DCO must outline what steps will be taken to reduce emissions from aircraft, including the use of sustainable aircraft fuel only, with a long term plan for continual reduction of fuel emissions
- The DCO should assess cumulative impacts on AQ on the local area from approved developments within and around the expanded DCO project area.

Chapter 6: Biodiversity**General Comments –**

1. In terms of trees, the scheme will require no direct impact to trees within the borough in terms of removals and so there would be have no comments regarding tree protection/ mitigation planting in relation to the construction works
2. However, there are strong concerns with the increase in air pollution and carbon emissions which will affect the wider area. Therefore, the Council would request mitigation planting to offset the increased pollution from the long term implementation of additional capacity at the airport as increasing tree cover in the borough improve the local air quality in response to the increases in greenhouse gasses.
3. Tree management is being driven by climate change and indeed the need to prepare for a different environment where trees will act as critical infrastructure in maintaining as reasonable as possible environment for people living in and working in the Borough.
4. The Council would request sustained and ongoing investment in the tree management of the Borough from Heathrow. This would support a transition in our tree stock (given that the Boroughs will start to lose species that is no longer within a comfortable climatic range) and re-stocking with species that is thought to be suitable for current and future climates.

Chapter 7: Carbon and other Greenhouse Gases

General comments –

1. Paragraph 7.1.2 sets out that the Chapter does not set out any changes to the potential effects ‘scoped into’ or ‘scoped out’ of the EIA as previously described in the 2018 EIA Scoping Report and as adopted in the 2018 EIA Scoping Opinion.
2. Heathrow has calculated the CO₂ emissions associated with each shortlisted flight path. However, it has used simplified methodology, and in particular it has not accounted for the additional CO₂ emissions due to arriving aircraft using certain flight paths having to make tight turns, requiring higher engine thrust (and fuel consumption), into the proposed final approach convergence point only 8km from the runway end. This is exacerbated by Heathrow expecting those generally to be the heaviest long-haul wide-body aircraft, e.g. A380s.
3. Table 7.5 sets out the summary of potentially significant effects and includes the following categories in the Scoping Report:
 - Emissions from construction of the DCO project;
 - Emissions from air transport;
 - Emissions from surface access transport; and
 - Emissions from Airport Buildings and Ground Operations (ABAGO)
4. Carbon Baseline and methodology are not clearly set out. The report should establish a transparent, independently verified baseline for both construction and operational emissions, including Scope 3 emissions from aircraft movements. Not accounting for aviation emissions would not reflect the full extent of the project's climate impact.
5. The assessment relies on optimistic national decarbonisation scenarios (e.g., Jet Zero “High Ambition”) without sensitivity analysis. The EIA should include alternative scenarios, including for potential policy failure or slower decarbonisation, to demonstrate climate risks if national policy does not deliver.
6. Heathrow’s expansion is assessed against the UK’s Sixth Carbon Budget and the London Environment Strategy. It is also worth noting that further recent airport expansions have recently been approved by the Government at London Gatwick, London City, London Stansted and London Luton which will also contribute to the UK’s carbon budget.
7. With net-zero commitments and warnings from the Climate Change Committee, the assessment must clearly show how more flights fit within these carbon limits without shifting the burden to other sectors. It should also report impacts on air quality and noise, as the project cannot move forward if it harms Londoners or breaches climate goals. Mitigation claims should be evaluated for deliverability and enforceability, not based on hopes for future technologies like SAF.
8. The assessment should address how additional airport infrastructure and operations will cope with climate impacts (heatwaves, flooding from the Thames, increased storm events). The Council expects a detailed Climate Resilience Strategy, not just reference to generic

design standards. 9. The cumulative assessment is insufficiently robust. There is little discussion of the combined impact of Heathrow expansion with other major developments in the region, or of how the project aligns with local and regional carbon budgets, including those set by the Council and the Greater London Authority. The Council expects a thorough cumulative assessment, including the project's contribution to exceeding local carbon budgets and undermining local climate action plans. 10. The assessment should comprehensively address how the expanded airport will manage increasing climate-related impacts. Reliance on general design standards is insufficient given the documented risks of more frequent heatwaves, intensified storm events, and flooding from the River Thames, which poses challenges for the area's tributaries and critical transport infrastructure around the airport. A robust Climate Resilience Strategy is required—one that moves beyond outdated assumptions and articulates specific, evidence-based adaptation measures. This strategy must clearly demonstrate the methods by which both new and existing infrastructure will be safeguarded against heat stress and flooding, and how operational continuity will be ensured. Importantly, the plan should be aligned with local and regional flood defence programs, provide transparent allocation of financial resources for ongoing adaptation, and undergo independent review to verify that it is grounded in current scientific understanding of evolving climate risks.

Chapter 8: Climate Change <u>General comments –</u> 1. The Council notes that the proposed Heathrow expansion may conflict with local, regional, and national climate targets, including the UK's 2050 Net Zero requirement and the Mayor of London's 2030 Net Zero goal. 2. Chapters 7 and 8 outline key topic areas for assessment; however, the current scope does not fully address the extent of emissions linked to airport expansion. 3. The proposed sustainability appraisal must align with London Plan Policy SI 1 (Improving air quality) and SI 2 (Minimising greenhouse gas emissions), as well as Wandsworth's Environment and Sustainability Strategy. There is little evidence that the assessment aligns with the London Plan, or other local and regional strategies for net zero and climate resilience. The Council expects the EIA to demonstrate clear alignment with these policies and to show how the project will contribute to, rather than undermine, local and regional climate objectives. 4. The scoping currently refers to generic principles; it should commit to a quantified, indicator-led assessment. 5. Heathrow must demonstrate measurable biodiversity net gain, consistent with the Environment Act 2021. Offsetting outside of West London or outside borough boundaries is unacceptable. 6. A cumulative impact assessment on the borough's open spaces and habitats (esp. River Thames corridor) is required.

7. Expansion risks exacerbating environmental inequalities: poorer communities often face greater exposure to aircraft noise, poor air quality and climate risk. The EIA Addendum refers to a Climate Change Adaptation Plan but lacks detail on how this will be updated, monitored, and enforced over time, especially as climate science and local conditions evolve. Wandsworth Council requires a commitment to ongoing engagement with local authorities, transparent reporting, and a mechanism for revising adaptation measures as new risks emerge.
8. The sustainability assessment should include a clear distributional analysis of who bears the negative externalities versus who benefits.
9. The scoping should require Heathrow to prepare a Circular Economy Statement consistent with London Plan Policy SI 7. On construction, there's no real sign of a Circular Economy Statement. Given London Plan SI7 and the Local Plan's emphasis on resource efficiency, the Applicant should be committing to measurable targets on embodied carbon, reuse and waste.
10. The Council expects quantified commitments on materials reuse, embodied carbon reduction and construction waste minimisation.

Chapter 9: Community

General Comments –

1. The London borough of Wandsworth is in the wider study area (WSA). There will also be wider, indirect effects as a result of direct effects, which may be experienced at a wider scale, including effects on the catchments of affected community facilities, wider effects on public service provision, and other indirect effects on communities related to construction activity and the operational DCO Project. These require consideration, to reflect the wider population potentially affected and providers, users and guardians of community facilities.
2. It is assumed that other major infrastructure projects which are currently being developed such as the River Thames Scheme are being taken into account.

Paragraph 9.1.4 – **OMISSION** – it is stated that the Community Assessment will draw on the outputs of other environmental topics and the Equality Impact Assessment. Reference is not made to the traffic and transport impacts in this respect and should be.

Paragraph 9.1.5 of the EIA Scoping Report (May 2018) – **OMISSION** –this paragraph discusses how mitigation measures will be used to reduce impacts but notes that where mitigation cannot prevent significant impacts, that these remaining impacts will be assessed. More information should be provided on what is to happen where significant impacts cannot be mitigated – the Council would question what actions will be taken.

Paragraph 9.2.3 –

Wandsworth Specific – **COMMENT** – The Wandsworth Local Plan was adopted on 19 July 2023. The Council is currently conducting a Partial Review of this Local Plan which includes a review and update of our planning policies to ensure we are delivering more genuinely affordable housing, with an emphasis on new social rented housing. Examination Hearings are scheduled to commence on 4 November 2025. The Council is currently consulting on a series of [SPDs](#) – on Biodiversity, Planning Obligations and Trees. Please note that documents relating to community uses have been published by the Council since 2018 as part of the [evidence base for the Local Plan](#). Of particular relevance are:

- Playing Pitch Strategy 2021 and updates (2024)
- Open Space Study 2021

Paragraph 9.3.1 Table 9.2 - The community engagement listed in Table 9.2 Engagement with Stakeholders relates to engagement in 2018. This table demonstrates how limited community engagement was. It was limited to 3 workshops with Heathrow Strategic Planning Group (HSPG) members, and which HSPG members who contributed is not made clear. HSPG is not regarded as one that represents a wide range of community group interests.

Local Authorities and their local community groups need to be included in that engagement.

Table 2 of the EIA Scoping Report (May 2018) focuses on the HSPG (or authorities who are geographically located within the areas covered by Local Planning Authorities who are members of the Group). The HSPG does not represent all boroughs who are impacted by Heathrow or its future operations if a 3rd Runway is developed. Focussing on this Group and its members risks skewing assessments to focus on the immediate neighbours of Heathrow to the detriment of boroughs further away such as Wandsworth. This approach needs to be reconsidered with the aim of balancing representation of authorities and their views.

Paragraph 9.3.1 – COMMENTS –

1. The Council supports a wide approach to public engagement. However, stakeholders such as the community groups and operators are not named specifically.
2. Paragraph 9.3.1 of the EIA Scoping Report (May 2018) outlines stakeholder engagement to date, i.e. up to the production of the Scoping Report in 2018. The focus for early engagement on the scope of the assessment was on the Heathrow Strategic Planning Group, but it is not clear exactly which community groups or Local Authorities contributed or whether they were represented as part of the HSPG*.
3. There are concerns about the lack of representation of other non-HSPG groups and of members of the wider community (e.g. residents groups). Reference is made to engaging with local authorities – it would be preferable to list these so it is clear who will be included in the engagement process.
4. Engagement has not included engagement with Local Authorities in the Wider Study Area, including Wandsworth. This engagement is required.

* Members with full status included: Heathrow Airport Ltd, Elmbridge Borough Council, London Borough of Ealing, London Borough of Hounslow, Royal Borough of Windsor and Maidenhead, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council.

Paragraph 9.3.2 – COMMENT – this paragraph states that following receipt of the 2018 EIA Scoping Opinion, further engagement was undertaken both in terms of consideration of formal feedback from consultation, and ongoing, informal engagement with communities, organisations, facilities and service providers set out within the 2018 EIA Scoping Report. Engagement has been both bilateral and, in the case of local authorities, sustained dialogue was also supported by the HSPG97, a co-ordinating forum representing the nine local boroughs.

Paragraph 9.3.3 – COMMENT – This paragraph states that ‘Engagement will continue as appropriate with the CISHA and local authorities. The Heathrow Community Engagement Board (HCEB) was the predecessor to CISHA, and so engagement that was previously with HCEB is now anticipated to be with CISHA’.

The Council would like to see specific information on how Local Authorities and communities that are not immediate neighbours of Heathrow but who are impacted by its current operations and the proposed 3rd Runway (such as Wandsworth) will be engaged and a commitment that their views will also help shape the design and expanded operation of the airport.

Paragraph 9.3 – the EIA Scoping Report (May 2018) includes reference to engagement through ‘listening events’ with local communities, held during April and May 2018. These are 7 years ago and there is a need to understand how attitudes to climate change and air travel may have changed. These ‘listening events’ need to be repeated in the Inner Study Area and WSA. Feedback from future listening events should be provided in the community assessment, with particular reference to what local residents have said about what they would like to change about their local community.

Paragraph 9.4.2 – **COMMENT** – states ‘The Community assessment requires several Study Areas which are set out within Section 9.4 of the 2018 EIA Scoping Report in terms of the spatial relationship of effects and receptors, by type of effect to be considered within the assessment.’ There is no map or figure, in this section or the introduction, which clearly illustrates the ISA, the Wider Study Area (WSA) core area and the remaining WSA. This should be included in the main EIA Scoping Report Addendum 2025. It is also not clearly included in the EIA Scoping Report (May 2018).

Wandsworth is not a borough that may be directly impacted by the physical expansion of Heathrow in terms of land-take etc for the new infrastructure requirements, but our residents and communities would be significantly impacted by the operation of a potential 3rd Runway once the project is complete and in use. It is therefore expected to be included in the community assessment.

Paragraph 9.4.24 – **OMISSION** – Community assessment in the 2018 EIA Scoping focuses very heavily on recreational areas and routes. This needs to be widened.

Paragraph 9.4.24 states: *‘Since the publication of the 2018 EIA Scoping Report, there are two potential effects (that were originally scoped into the assessment within the Socio-Economics and employment chapter) that are now intended to be assessed as part of the Community assessment, as a result of the interaction with other assessment areas under ‘Community’.*

These are:

- *the ‘potential temporary effect of employment generation and construction activity on the labour market and subsequently the housing market’; and*
- *the ‘potential additional effects on the wider labour market and housing market as a result of operational employment generation’.*

Assessment of potential impact on the impact of housing, including availability and affordability, needs to be woven into the overall approach; into the data sources; groups for engagement; subject for baseline surveys; characteristics of study areas; the list of community facilities/resources.

Paragraph 9.1-9.6 (102-110) – COMMENTS –

1. The WSA will remain as defined within the 2018 EIA Scoping Report (but updated to include Buckinghamshire Council due to the administrative re-organisation of some Local Authorities). The London borough of Wandsworth are in the WSA.
2. The EIA Scoping Report (May 2018) defines the WSA in the Community chapter which would be reasonable.
3. Paragraph 9.4.4 – There will also be wider, indirect effects as a result of these direct effects, which may be experienced at a wider scale, including effects on the catchments of affected community facilities, wider effects on public service provision, and other indirect effects on communities related to construction activity and the operational DCO Project. These require a wider study area, to reflect the wider population potentially affected and providers, users and guardians of community facilities.
4. Paragraph 9.4.5 – The community assessment will draw on other environmental assessments – such as noise, transport, air quality and landscape and visual amenity assessments – to identify any residual significant effects on community receptors identified, and as such will refer to the study area for potential significant effects identified by these and other relevant assessments.
5. This Chapter details the extent to which the community assessment, as set out in the 2018 EIA Scoping Report and accounted for in the 2018 EIA Scoping Opinion as was adopted, is proposed to be amended. To fully understand the differences would require extensive cross checking and referencing appendices.

Paragraphs 9.4.8 and 9.4.20 – COMMENTS –

1. These paragraphs relate to baseline data and are based on the 2018 EIA Scoping Report.
2. Baseline surveys, para 9.5.2 in the EIA Scoping Report (May 2018), only relate to community facilities within the Inner Study Area. Noise and pollution potentially impact the Wider Study Area, and they should be included.
3. In the EIA Scoping Report (May 2018) Table 9.4 *Characteristics of inner study area and communities within it*, only details communities within the ISA. There is no equivalent assessment within the WSA, this should be included.
4. Paragraph 9.8.1 of the EIA Scoping Report (May 2018) states that ‘At this stage of the DCO Project development, no effects have been scoped out of the assessment.’ If the geographical Study Area is not wide enough then by default all impacts have been scoped out for those areas not within the defined area. The focus for community assessment is the ISA. Inadequate information has been provided on the different approaches to different areas within the overall Study Area, including approaches to assessment of both the ISA and WSA. The WSA needs to be clearly and effectively included in the Community assessment.

Chapter 10: Economics and Employment

Paragraph 10.1-10.58 (pages 111-122) – COMMENT –

This Chapter describes how the scope of the Economics and Employment assessment set out in the 2018 EIA Scoping Report and accounted for in the 2018 EIA Scoping Opinion as was adopted, is proposed to be amended.

The Proposed Approach set out in Section 10.9 of the 2018 EIA Scoping Report remains valid. Paragraph 10.4.2 there is no change to the approach to the economics assessment in the ES.

Paragraph 10.4. 2 – COMMENT – The second bullet point states:

'The principles of the WSA remain the same [...] There will be three WSAs:

- *The Core Study Area which comprises nine local authority areas (does not include Wandsworth)*
- *A Regional Study Area – made up of London and the South East England, this replaced the wider-subregional context area*
- *The Heathrow Commuting Area will be used to assess effects related to the construction workforce'*

It is assumed that the London Borough of Wandsworth is in a 'Regional Study Area, but this is not explicit and London and the South East England represents a highly diverse area.

Paragraph 10.4.6 – COMMENTS –

1. This paragraph lists the public data sources and information relating to existing conditions at and around the DCO Project boundary to establish the prevailing socio-economic including (but not limited to): 11 sources are listed. This list does not include The London Freight Data Report (2014) or updated equivalent which informed the London Industrial Land Demand Final Report (Oct 2017).
2. The London Industrial Land Demand Final Report (Oct 2017) which formed part of the Wandsworth Local Plan (2023) evidence base includes a section considering 'Drivers of Demand for Land' p169.
3. The London Freight Data Reports states that 78% of the UK's air freight passed through the London area airports of Heathrow, Gatwick, Stansted and Luton in 2012. Annual air freight tonnages at London area airports have been relatively stable since 2000, following a period of continuous growth prior to this. Heathrow dominates the air freight market in London and in the UK.
4. Heathrow Cargo Strategy states that Heathrow provided 76% of all air cargo in the UK in 2015, and handled £80 billion of trade by value (26% of the UK's trade in goods, by value). Passenger and freight flights are closely linked: the strategy reports that 95% of Heathrow's cargo currently flies in the bellyhold of passenger aircraft.

Paragraph 10.5 – COMMENTS – Docks & wharves are also referenced (173)

1. The Port of London Authority issues licences for 80 operational wharves, both within and outside London. The London Freight Data Report (2014) reports that there are currently 50 safeguarded wharves for freight transport on the Thames and its tributaries in London. The London Freight Data Report states that approximately 45 million tonnes of goods originating from overseas and UK ports were handled at wharves in the PLA in 2012. Of this, 7 million tonnes of these goods were loaded or unloaded at a PLA wharf within Greater London, and 0.2 million tonnes were transported between wharves in London.
2. The London Plan policies recognise the strategic benefits of water freight as an alternative to road transport, as a way of tackling road congestion and reducing CO2 emissions. Water transport is supported by London Plan policies on waste (policy 5.17), on construction, excavation and demolition waste (policy 5.18), on aggregates (policy 5.2), on freight transport (policy 6.14) and on increasing use of the Blue Ribbon Network (policy 7.26).
3. In relation to freight the 2018 EIA Scoping Opinion considers:
 - Freight by rail with a focus on facilities used for the construction phase (17.10.11; 3.4.14; 5.10.33)
 - Construction freight movements on the highway (17.10.4; 5.10.6)
 - Increase in freight movements to and from the airport
 - Freight forwarding (table 3.8)
 - The use of freight consolidation sites (5.10.3)
 - Freight facilities –(5.10.33) In the future, Heathrow seek to double freight handling capacity, but minimise the number of individual freight journeys on the road network surrounding Heathrow
 - measures have also been identified to influence freight vehicles and delivery behaviour (5.10.34)
 - Emissions from surface access due to freight and retail operations and construction site traffic (table 7.1)
 - Current baseline data does not report on (non-aviation) freight transport related emissions associated with the goods and services provided at Heathrow, nor does it include construction and maintenance activities (7.9.31)
 - all modes of surface transport using the public highway and public transport networks including: 1. Private vehicle movements, to include freight (17.1.3)
 - Highways – to include private vehicle flows, road freight flows (17.9.4)
4. There is limited reference in the to the impact of increased freight on the Wider Study Area including the London Borough of Wandsworth in both the construction phase and ongoing operations in the future; or reference to impact on wharves, which is particularly relevant to Wandsworth.

Paragraph 10.4.8 – **COMMENTS** – The ES should provide detail about the applicant's strategy for securing the delivery of training and employment opportunities (including local supply chain) that will be generated through the

construction and operational phases of the development (Scoping report states that c. 10,000 apprenticeship starts will be provided through the Heathrow Academy working with Skills England). The Councils' Economic Development Office (EDO) should be engaged from an early stage to ensure maximum opportunities are secured for residents of the Boroughs.

Chapter 11: Historic Environment

General comments –

1. There is little to comment on as the information provided is limited. The original 2018 EIA Scoping Opinion identified the core study area which immediately surrounds the site but it is yet to identify the wider study area for affected designated heritage assets.
2. The Addendum states that the core study area will need to be reviewed as well as the wider study area.
3. The historic environment of Wandsworth would not be impacted to the same extent by the proposals, and it is noted that the Historic Environment was not highlighted in the Council's 2018 response to the scoping opinion so there are more limited comments to provide on this response.

Chapter 12: Health

General comments –

1. As an addendum, it assumes familiarity with the 2018 report, potentially reducing standalone clarity (e.g., cross-references without full repetition). Some methodologies are high-level, pending further data. This overall adds to confusion, it would have been preferable to update the 2018 report to facilitate consistency.
2. The proposal is narrower in scope than the EIA for Gatwick, while it highlights justifications, it scopes out effects like flood/rivers on health or aviation fuel storage, this approach could overlook indirect health impact pathways (e.g. mental health impacts from flooding).
3. Better integration for the following areas within the health chapters is needed: indirect health effects, community impacts, cumulative health impacts of proposals alongside wider contextual changes (e.g. airspace redesign).
4. The health scope does not adequately address impact on mental health and wellbeing, health inequalities, or include analysis of intersectional cumulative health impacts on vulnerable groups.
5. Specific assessment of health impacts of Ultra Fine Particles (UFP) is needed in addition to assessment of the aggregated impacts of PM_{2.5} (all sources) even if there might not be any required standards for PM₁'s. There is increasing evidence that exposure to UFP (often defined as particles that are smaller than 100 nm in diameter) is associated with adverse health outcomes.
6. Integration of local public health data and community-specific vulnerabilities within the context of the methodology is needed. This includes data covering Wandsworth residents via the South West London Integrated Care Board (ICB).
7. The methodology needs to account for cumulative and long-term health impacts, demographic change and climate-related health risks.
8. Limited detail on cumulative effects, intra-project cumulatives are integrated, but inter-project (e.g., with other NSIPs) are deferred to Chapter 19, with less health-specific detail at scoping. This should be considered alongside the environmental cumulative impacts which is reference in context of Advice on Cumulative Effects Assessment (Nationally Significant Infrastructure Projects) published by Government in 2024.
9. Note that while the contribution of vehicle transport has reduced over the years, that of aviation has risen. However, the transport emission benchmark excludes aviation.
10. Consideration of improving expanding public transport to Heathrow is not addressed. The proposal mentions new parking spaces but nothing on improving sustainable (public) transport.
11. Meaningful stakeholder engagement, particularly with affected

communities and local health professionals is essential to ensure qualitative health impacts captured and is not adequately represented within the scope.

12. While updated, the scoping does not sufficiently address emerging issues like post-COVID health resilience or biodiversity-health links.
13. The scoping addendum appendices note that that the London Health Urban Development Unit (HUDU) HIA tools are not considered appropriate to the scale and complexity of the HIA required – we agree that references to use of this tool should be removed from the scoping. It is suggested that the IEMA guide: Effective Scoping of Human Health in EIA (2021) should be considered as an alternative.

Section 12.1 Key issues missing or under scoped – **COMMENTS** –

The scoping report (and Health and Equalities Screening Matrix and baseline receptor mapping in appendices part 2 and 3) do not sufficiently address differential health impacts on vulnerable groups nor the cumulative intersectional health impacts on those groups experiencing multiple vulnerabilities.

In relation to:

- **Wandsworth:** the borough has significant disparities in health outcomes. This includes:
 - Life expectancy up to 9 years lower in its most deprived wards.
 - Vulnerable groups—including children in low-income families, isolated older adults, and ethnic minorities—are disproportionately affected by environmental stressors.

While there is reference to noise mapping, mental health impacts are underrepresented in the scope. Chronic noise exposure, disruption from construction, and displacement risks can contribute to:

- Sleep disturbance
- Stress and anxiety
- Loss of community cohesion

Section 12.4 (Methodology) – **COMMENTS** –

The scoping methodology focuses on discrete assessment years (e.g. construction, opening, 2040), which may miss:

- Cumulative exposure effects from noise, air pollution, and traffic.
- Long-term health trajectories, especially for chronic conditions.
- Noise pollution is seen as the biggest risk to health and wellbeing but it's difficult to comment on its impact, as the flight paths have not been provided.

Table 12.5 (Potential effects scoped out) – COMMENTS –

The scope includes PM_{2.5} and NO₂ but does not adequately address ultrafine particles (UFPs), which are particularly relevant near airports and pose significant health risks.

Although UFPs are a subset of PM_{2.5}, PM_{2.5} limits are based on total mass of particles per cubic metre of air. Because ultrafine particles are so small, there can be huge numbers per cubic metre without exceeding PM_{2.5} limits. The health effects of UFPs are therefore better correlated with particle number than total mass – these measurements should be added to the methodology and scope of the EIA and monitoring plans.

A recent study has shown that emissions of UFP from aircraft are a major factor in local air pollution concentrations and emissions near Heathrow ([Stacy et al, 2023](#)).

While climate change is scoped in terms of emissions and adaptation, the health implications of climate impacts (e.g. heat stress, flooding, vector-borne disease) are not addressed. Climate-related health risks and adaptation needs for vulnerable populations should be scoped into the EIA.

Table 12.2 – COMMENTS – Indirect pathways (e.g. economic stress, housing displacement, changes in access to green space) are not well integrated into the health scoping. The Community, Health, Air Quality and Noise chapters are also treated separately, which will likely lead to disconnected assessments and an underestimation of cumulative impacts.

Methodological Concerns - COMMENTS –

The proposed methodology relies on national datasets and generalised indicators, which risks overlooking borough-specific and hyperlocal vulnerabilities. E.g.

- High levels of noise sensitivity in certain communities, especially in areas under flight paths, and areas of high residential density amplifying the public health impact of noise exposure.
- Local health inequalities e.g. Children in low-income families and ethnic minorities more likely to live in areas affected by flight paths and traffic corridors.
- Existing air quality exceedances near major roads with increased resultant surface traffic likely to worsen already polluted areas.
- Impact on ecologically and socially important green spaces that support public health and wellbeing.
- Location of schools, care homes, and healthcare facilities near transport corridors and flight paths.
- Concerns on an overreliance on quantitative modelling - Quantitative risk models may underrepresent qualitative impacts such as lived experience, community stress, and mental wellbeing.
- The methodology does not account for:
 - Future demographic shifts (e.g. ageing population and urban development pressures)

- Technological and contextual changes, particularly airspace redesign, which is addressed separately, risking fragmented impact assessment. The cumulative health impacts of these proposals alongside airspace redesign should be scoped in.

Chapter 13: Landscape and Visual Amenity

General comments –

1. Overall, there is little specific to comment on as at this stage as the approach only deals with impacts on a restricted area around Heathrow. The proposals /masterplan appears very outline at this stage.
2. It is noted that the reference local authority planning policy documents have not been updated yet.
3. In relation to landscape and visual amenity, the main concern for Wandsworth would be the impact of increased density of flights, in terms of noise, air pollution and visual intrusion in particular in relation to sensitive landscapes. A much wider area will need to be considered in the ES beyond the limited area 'scoped in' shown at this stage.
4. Paragraph 13.4.3 Study Area Table 13.5 2018 EIA Scoping Report likely significant landscape and visual effects only relates to a limited area around the site. The Council would disagree with the statement that '*...beyond this distance significant effects are not expected to occur.*' (13.4.3).
5. There are extensive areas of MOL & Green Belt where character may be negatively affected by increased overhead flights and associated issues, in addition to townscapes with a high density of conservation areas. Therefore, further consideration must be given to this.
6. Views: it is expected that the proposed 87m tower would be visible from elevated locations; visibility from this borough should be reviewed under the Landscape Visual Impact Assessment. There is a Wandsworth Local Plan Local Views SPD which should be referred to and considered.
7. Tree management is being driven by climate change and indeed the need to prepare for a different environment where trees will act as critical infrastructure in maintaining as reasonable as possible environment for people living in and working in the Borough.
8. The Council would request sustained and ongoing investment in the tree management of the Borough from Heathrow. This would support a transition in our tree stock (given that the Boroughs will start to lose species that is no longer within a comfortable climatic range) and re-stocking with species that is thought to be suitable for current and future climates.

Chapter 14: Land Quality

General Comments –

1. Overall, this is a highly complex document due to the sheer volume of material presented to stakeholders. The task of understanding what is proposed has been made even more difficult by information being either missing or spread between documents and appendices have been included which do not integrate the data into the main body of text.
2. This mainly concerns the host Borough, however if contamination is found and to be transported through adjacent boroughs, there needs to be confidence that no spillage, odours or potential for secondary contamination can arise.
3. The first few pages of the *Scoping Report Addendum Appendices Part 4 (Pages 2751-3118)*, cite the position of PHE. It is advised to replace that acronym with its modern replacement, UKHSA.
4. Nothing further to scope in. The boroughs would not require an EIA from the perspective of the contaminated land.

Chapter 15: Major Accidents and Disasters

General comments -

Section 15.4 – OMISSION - Greater clarity is required on the methodology which will be used. This includes a risk-based approach (qualitative, semi-quantitative, or quantitative). The following should be scoped in:

- Criteria for identifying potential major accidents and disasters (likelihood × consequence).
- Consideration of both on-site and off-site hazards.
- Use of existing risk registers, accident databases, and guidance (e.g., HSE, Environment Agency flood risk data, Met Office climate data).
- How cumulative and interrelated effects will be considered.

Paragraph 15.4.4 – FURTHER INFORMATION REQUIRED – greater clarification is required on baseline conditions. This includes:

- Context of the project location in relation to accident and disaster risks.
- Proximity to sensitive receptors (population centres, protected sites, critical infrastructure).
- Existing hazards in the area (e.g., flood zones, seismic risks, industrial facilities subject to COMAH, airports, transport corridors).
- Historical data on accidents/disasters relevant to the site.

General comments –

1. Further clarity should be provided on the assessment of likely significant effects. This includes:
 - Identification of credible accident/disaster scenarios.
 - Assessment of their likelihood and potential consequences for the environment and human health.
 - Explanation of which risks are screened in/out of detailed assessment.
 - Justification for scoping decisions (e.g., certain events being extremely unlikely or already regulated under other regimes).
2. Further information should be provided on mitigation measures. This would include:
 - How the project design reduces risk (engineering controls, safety systems, flood defences).
 - Emergency response and contingency measures.
 - Interfaces with other regulatory regimes (COMAH, HSE, ONR, Environment Agency).
 - Residual risks after mitigation.

Chapter 16: Noise

General Comments –

1. Summary:

- The 2025 EIA Scoping Addendum does not adequately address or provide sufficient information on the following points:
- Aircraft noise modelling and assumptions,
- Absence of confirmed flight paths,
- Inadequate mitigation and compensation,
- Health impacts from noise exposure,
- Lack of transparency and independent scrutiny,
- Impact on protected tranquil areas as defined in the NPPF.
- Recommendation: The Environmental Statement must address these gaps with enforceable commitments, transparent modelling, and community-led engagement.

2. Aircraft Noise Modelling and Assumptions

- The Addendum relies on optimistic assumptions (e.g. 5% climb rates, accelerated fleet modernisation) without sensitivity testing or independent validation.
- It is unclear how fleet modernisation will be facilitated or enforced through the proposals.
- Noise contours are based on indicative “design envelopes” due to lack of final flight paths, this is insufficient for assessing real-world impacts.
- Use of LAeq,16h and LAeq,8h metrics alone fails to capture event frequency impacts or the human perception of noise, this is especially critical for newly overflowed areas.
- Recommendation: Noise modelling must be independently peer-reviewed, sensitivity-tested, and include event-based metrics (N60/N70/N80) to reflect real-world disturbance.

3. Impacts on Wandsworth

- The borough is already significantly affected by Heathrow operations, particularly during westerly arrivals and early morning flights.
- Early Growth (25,000 additional ATMs) and future three-runway operations will increase overflight frequency, especially between 06:00–07:00.
- Newly overflowed areas are not clearly identified, and no mitigation strategy is proposed for these communities.
- Recommendation: The ES must map and assess newly affected areas in Wandsworth, with targeted mitigation and community consultation.

4. Noise Thresholds and Metrics

- LOAEL / SOAEL – Relevant Considerations
- LOAEL (Lowest Observed Adverse Effect Level): 51 dB LAeq,16h (day), 45 dB LAeq,8h (night)
- SOAEL (Significant Observed Adverse Effect Level): 63 dB LAeq,16h (day), 55 dB LAeq,8h (night)
- These thresholds are used to determine eligibility for mitigation

such as insulation and are consistent with UK aviation policy.

5. Event-Based Metrics:

- N60 / N70 / N80: Refer to the number of aircraft noise events exceeding 60, 70, or 80 dB LA_{max} respectively.
- These metrics are essential for assessing sleep disturbance and annoyance, especially in areas with frequent overflights.
- Recommendation: The ES must include both average and event-based metrics to fully assess community impact and inform mitigation.

6. Noise Insulation and Eligibility

- The proposed extension of eligibility to 54 dB LA_{eq,16h} (with ≥3 dB increase) is welcomed.
- The £3,000 lump sum is considered inadequate for meaningful insulation in the London housing stock.
- Outdoor spaces (e.g. school playgrounds, parks) and vulnerable groups must be included.
- Based on updated contour mapping (2023), the 54 dB LA_{eq,16h} contour covers 128.5 km² and includes areas of Wandsworth.
- Under Aviation 2050 proposals, properties within this contour or experiencing a ≥3 dB increase would be eligible.
- Recommendation: Heathrow must confirm eligibility criteria and publish detailed contour maps showing affected properties in Wandsworth. Insulation schemes must be fully implemented before any additional capacity is released.

7. Night Flights and Sleep Disturbance

- Proposed 6.5-hour ban (23:00–05:30) is misleading, and:
- Allows late arrivals until midnight,
- Allows early arrivals from 05:30,
- There are no restrictions after 06:00.
- This results in only 5.5 hours of potential respite and is below the WHO recommended sleep durations.
- Recommendation: A minimum 7-hour night flight ban (23:00–06:00) must be adopted to protect public health.

8. Noise Envelope and Environmental Management

- The proposed noise envelope lacks enforceable limits and does not include a cap on aircraft movements.
- Use of total QC or LA_{eq} contours alone is insufficient to represent the impact of noise.
- The Environmentally Managed Growth (EMG) framework lacks independent oversight and enforceability.
- Recommendation: The noise envelope must include:
 - A cap on aircraft movements,
 - Event-based metrics (N60/N70/N80),
 - Annual validation of assumptions,
 - Specific protections for newly affected communities.

9. Health Impact Summary

- Aircraft noise exposure has well-documented health implications:

- Sleep disturbance from early morning arrivals contributes to fatigue, stress, and reduced wellbeing.
- Cardiovascular risks including hypertension and heart disease are linked to chronic noise exposure.
- Cognitive effects in children due to disrupted learning environments in schools under flight paths.
- Mental health impacts such as anxiety and reduced quality of life from persistent noise annoyance.
- Vulnerable populations (children, elderly, those with pre-existing conditions) are disproportionately affected.
- Recommendation: The ES must adopt WHO Environmental Noise Guidelines (2018) and assess health impacts using both average and event-based metrics.

10. Tranquil Areas – NPPF Consideration

- The NPPF and Planning Practice Guidance require planning authorities to protect areas of tranquillity from noise intrusion.
- Wandsworth contains several tranquil areas (e.g. Wimbledon Common, Putney Heath).
- Recommendation: The ES must identify and assess tranquil areas and propose mitigation to preserve their character and public health value.

11. Local Noise Monitoring

- Heathrow Airport operates a network of fixed and mobile noise monitors across the region.
- These are used to:
 - Respond to complaints,
 - Track changes in aircraft noise exposure,
 - Inform contour modelling and mitigation eligibility.
- Recommendation: Heathrow's monitoring network must be expanded to include:
 - Newly affected areas,
 - Sensitive receptors (e.g. schools, care homes),
 - Real-time public access to data,
- For public confidence this must include community-led monitoring initiatives.

Chapter 17: Traffic and Transport

General comments –

1. The 2018 EIA Scoping Report set out the proposed approach for assessing traffic and transport effects. The EIA Scoping Report Addendum identifies those areas where previous guidance and information has been withdrawn, updated, superseded or replaced. Additionally, some terminology has changed. However, in general terms the proposed methodology is very similar to that proposed in the 2018 Report.
2. It is vital that the baseline traffic and transport information/data is robust and agreed with stakeholders, including Transport for London. It is noted that Heathrow Airport Limited and TfL disagreed on data and assumptions previously. The Addendum states that “Since publication of the 2018 EIA Scoping Report, overall baseline conditions remain broadly unchanged”. However, there was massive change in travel supply and demand between 2020 and 2022 due to Covid. Whilst there is now a more stable travel environment, bus and rail capacity has changed since 2018 including changes to trains serving Hounslow – as have working patterns and trips (e.g. more time is spent working from home, and home deliveries make up a greater proportion of vehicular traffic).
3. Paragraph 17.4.5 of the Addendum says that “*The ES will provide a comprehensive review of baseline conditions that reflects the most up-to-date information available*”. It is possible that the most up-to-date information will not always be the most robust information that should be used for the baseline purposes of the assessment. As an example, paragraph 17.4.19 of the Addendum proposes to use Personal Injury Collision data for the most recent five-year period, currently 2019 to 2023, but the period 2020-2022 is particularly unrepresentative of baseline road conditions.
4. Section 17.10 of the 2018 EIA Scoping Report outlined the proposed approach to mitigating traffic and transport impacts during construction and operation. The current Addendum proposes no change to this section of the 2018 Report. Section 17.10.7 of the 2018 Report sets out targets for mode shift and mode share and a commitment to “*no increase in Heathrow related [private motor] traffic*”. In simple terms, all the increase in passenger journeys from airport expansion would need to be accompanied by no net increase in car trips. The Addendum references the proposed Surface Access Strategy and Transport Assessment which would accompany the DCO application. However, without knowing at this stage the details of the mitigation there is no confidence that airport expansion could occur without an increase in private road traffic. There is no specific commitment or timescales to increasing public transport capacity or infrastructure. It is also noted that the “no extra traffic” cordon previously proposed was tightly drawn around the airport and excluded many ancillary airport services that are located outside the perimeter.
5. Wandsworth Council has long been of the view that Clapham Junction should be connected directly to Heathrow. This would enable a strong public transport connection to south and south-west London reducing

the need to use cars and avoiding a need for public transport users to travel into central London and out again. The cost of direct rail access would be fraction of the cost of moving the M25 with a substantial benefit and yet such proposals do not form part of the DCO project. Whilst being wholly opposed to expansion, the Council's view is that transformational sustainable public transport proposals should be inclusive of the DCO project and ES.

- 6. Moving the M25 and works to other major roads and junctions appears to be unnecessary, unsustainable development not requiring an ES to state otherwise.

Chapter 18: Water Environment

General Comments –

- 1. The River Thames Scheme is a large-scale flood risk scheme currently in development between Egham and Teddington. There is some overlap in assessment areas between the River Thames Scheme and this project. Consultation with the EA and Surrey County Council about the interaction between these two schemes should be prioritised.

Table 18.1 – COMMENT – The newly published DEFRA National Standards for SuDS should be included in the list of relevant policy/guidance documents to be considered in the scoping report. These standards should be adhered to in the development of the drainage strategy of this project.

Paragraph 18.3.2 – COMMENT – refers to engagement that has taken place with the LLFA's, however the Council are not aware of any such engagement. It is requested that further engagement is undertaken with LLFA officers through the development of this project. The LLFA were also not listed in the relevant stakeholders list on the original scoping document.

Paragraph 18.4.6 – NOTE – It is noted that the newly updated EA flood maps have been identified as a primary baseline data update.

Chapter 19: Cumulative Effects Assessment

General comments –

1. Paragraph 19.4.1 (Approach to Cumulative Assessment) – the Council would encourage further information on the approach which is being taken to assessing the cumulative impacts. This could include criteria for inclusion/exclusion and assessment tiers such as screening, scoping and full assessment stages. This could also include a list of other projects which have been consented and not built yet projects, projects under construction and projects with submitted applications to fully understand the impacts which the proposals would have on these extant projects coming forward.
2. Paragraph 19.5.2 sets out that *“in 2018 PINS undertook their own screening of transboundary effects which concluded that on the basis of current information available, the Inspectorate was of the view that the DCO Project is not likely to have a significant effect on the environment [...]”*. The Council would welcome further information and a more up to date screening of the transboundary effects given that six years has passed since this took place.

Chapter 20: Outline Structure of Environmental Statement

No comments.