



RICHINGS PARK Residents' Association



THE IVERS PARISH COUNCIL

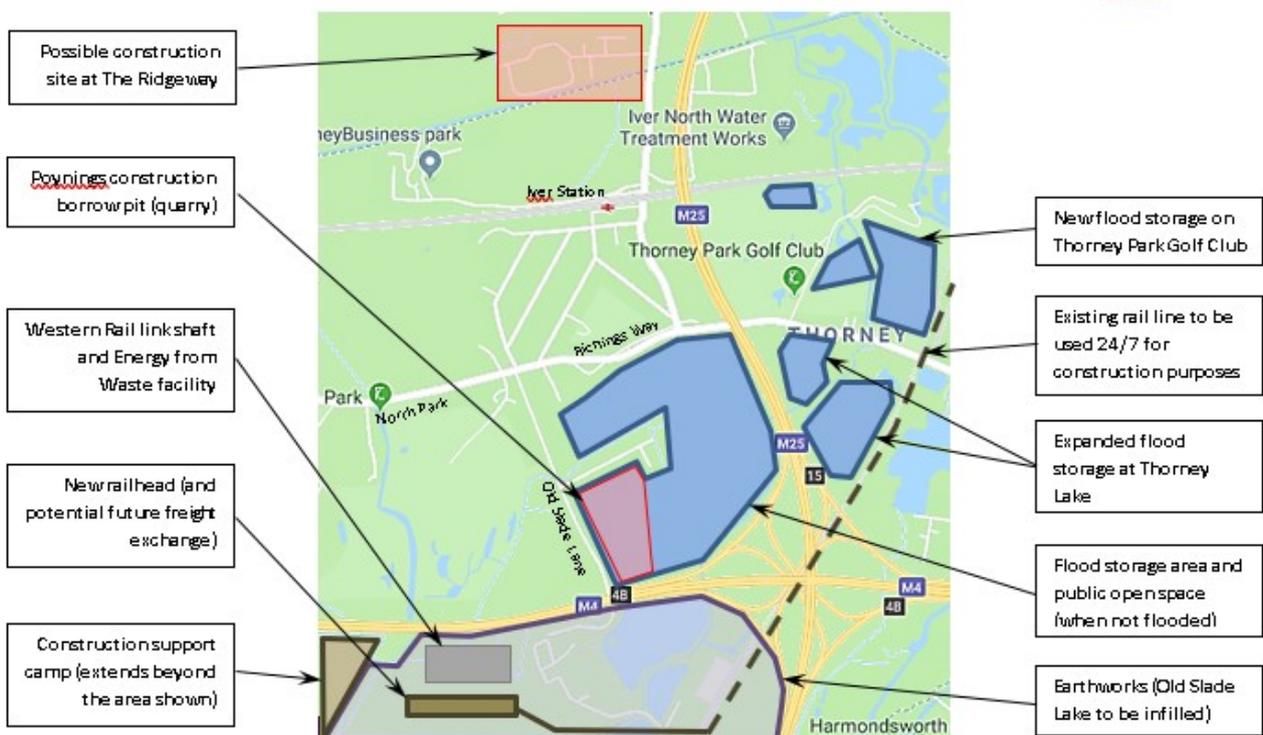
Heathrow Expansion Airport Expansion Consultation

Consultation response from:

Richings Park Residents' Association, Richings Park, and The Ivers Parish Council, Iver, Buckinghamshire

Introduction

1. We welcome the opportunity to comment on Heathrow's plans for airport expansion. However, we have found the information relevant to Richings Park and Iver very difficult to find and hence, the impacts hard to assess. The information provided in the Richings Park document, prepared by Heathrow, is far too generic and lightweight to be of any value to our community. It skips the key information so that we are unable to comprehensively assess what the impact is on Richings Park and Iver. Few of the construction proposals or environmental impacts are included in this document – see diagram below. This is very disappointing after all our representation at Heathrow's various community engagement forums. It suggests that Heathrow is either paying lip service to its environmental obligations or the construction proposals and their impacts are poorly studied and understood.



2. We have had to work through every one of the consultation documents to find information relevant to Richings Park and Iver – there is no one single source that provides the information we need. This has taken a lot of time and effort. We are a small community with limited resources, which have been stretched very hard by the consultation. Therefore, we caveat our response by saying that there may be information we have overlooked and hence, significant other impacts that we have not addressed in this document, but this does not mean that they are not also important to our community.
3. There is no one person in Heathrow that knows and understands the entire plans for the Iver area and their impacts. Consequently, we have had to consult numerous individual experts (construction, logistics, etc) to try to get to the bottom of what is actually being planned. Many of these experts contradicted one another and some simply didn't know what was planned nor did they know what the impacts would be when asked. This is confusing and frustrating for residents in being able to assess and respond effectively to Heathrow's plans for our area. **Heathrow should have a dedicated project manager for each area who can join together the experts' proposals, eliminate inconsistency and assess the total impact.**
4. Also, whilst we understand that the plans, and hence the environmental impact assessment, are preliminary at the stage, many of the plans for the Iver area and their potential impacts are either unclear or have not been provided, which makes it impossible for us to properly assess and respond to the consultation.
5. We are also concerned that the consultation event in Richings Park was held in the middle of the summer holiday period. Many of our residents would prefer to provide their feedback in person and were simply unable to make the event as they were away on annual family holiday. Whilst we appreciate that Heathrow has a timeline to adhere to, the residents of Richings Park feel that they have been treated unfairly in this respect.
6. Overall, we conclude:
 - a. As the construction proposals for the Iver area are poorly defined, we are left to assume the worst case: extreme, unmitigated environmental impact – we are not convinced that Heathrow understands the effects on our villages.
 - b. These construction works are extensive and will have a marked and detrimental environmental impact on our local community for many years.
 - c. Aircraft noise from early growth and the third runway in Richings Park is understated. Combined with aircraft noise from potential overhead flight, Richings Park will be significantly impacted and yet is unfairly excluded from the wider property offer zone despite it being clear in various documents that we will indeed be impacted. We understand that a special case is being developed for Stanwell Moor which is in a similar location on the south side of the airport. This is discrimination and we expect a similar proposal to come forward for Richings Park.
 - d. Whilst ground noise impact is acknowledged by Heathrow, no evidence is provided on the potential effectiveness of the proposed sound barrier nor is it shown on any of the maps, so we have no confidence in this mitigation measure.
 - e. The cumulative effects of all these construction works/operations have also not been considered.
 - f. We elaborate on these views in more detail in the following sections of this document.

7. **We are strongly opposed to any development that will impact on our quality of life in terms of noise, dust, light pollution, increased road traffic, particularly HGVs, and air pollutants, as well as serious property blight.** Heathrow must seek alternative, less impacting sites for the works they propose in the Iver area.
8. For other impacts in Richings Park (from other construction sites, aircraft and ground noise, increased cargo traffic), Heathrow must make a commitment to implement mitigation and compensation before construction activity takes place or any increase in ATMs is implemented.
9. Please note that when referring to the Iver area in this document, this includes the localities of: Richings Park, Iver Village, Iver Heath and Thorney. Thorney is specifically included as part of this response is because:
 - a) It is part of Richings Park and is significantly affected by these proposals
 - b) Any operation in Thorney affects Richings park, as there is currently only one exit route for HGV traffic due to width restrictions in West Drayton
 - c) Recreation facilities for Richings Park are located in Thorney.

Opportunity sites

10. **Poynings Borrow Pit** – The Richings Park document (Heathrow expansion and your area) states that land east of Old Slade Lane and south of the Poynings will be used as a borrow pit (page 6) and a map is provided to confirm this on page 41 of the Preferred Masterplan (Error: Reference source not found). (Although we note that in the Construction Proposals, Graphic 6.4, the borrow pit is shown in a different location – on Richings Park golf course.)
11. However, in the Updated SDR (Document 4 Chapter 10) this broad area (denoted as BP05) was deemed unworkable and was deselected as a viable option. A number of other sites were identified for earthworks in Richings Park and the Iver area, but these were rated as red 'because of their reliance on a haul route through the area of BP05 or residential areas as well as Old Slade Lane Bridge or new temporary bridge over M4'.
12. It is, therefore, extraordinary how The Poynings site has subsequently been earmarked as suitable for a borrow pit when it has not been comprehensively evaluated and it would be located within the area of BP05, which has been ruled out for access reasons. **We request the detailed assessment setting out how The Poynings site has not been similarly ruled out**
13. Whilst Heathrow may wish to obtain aggregates in the locality of the airport to reduce road miles, should this be at any cost? It certainly shouldn't be at the cost of causing more environmental impact to a local community that will be blighted by having a runway built within 1km of their homes. We have enough to cope with from aircraft and ground noise without having additional impact from gravel extraction. Heathrow should make more effort to find gravel sources from other locations that are less impacting to those residents in the local areas.
14. **Ridgeway** – Of the 'opportunity sites' identified for the Iver area, The Ridgeway Business Park is excluded from the list, but we know from meetings that Heathrow has held with our local representatives this is an area that has been considered for modular assembly of construction elements (a construction hub). Is this site being considered and if so, why has it not been comprehensively evaluated along with the other sites and the outcome made transparent in the documents?

15. We are concerned about the transport routes that Heathrow would have to use from this site for oversized vehicle loads, due to the road width restrictions in Iver village (Thorney Lane South) and Richings Park (North Park) plus the general HGV traffic through our villages. No mention of this has been made in the consultation documents and whilst these may be at the preliminary stage, we would expect this issue to be recognised together with a commitment to establish the traffic effects on local roads and the community; plus some early, high level findings from a traffic modelling study, as this would clearly be a major traffic route.
16. **Employment sites** – We are concerned to read in the Preferred Masterplan (page 66) that Heathrow intends to relocate significant employment sites to locations where they can be easily accessed by public transport, on a bike or on foot. Where will these centres be located? There are no plans identified in any of the consultation documents. Heathrow must make transparent the location of these employment sites so that the environmental impacts can be cumulatively assessed with all the other impacts from their proposals.
17. **Heathrow's development area** – The aerial extent of the Development Consent Order (the 'planning application') plus other parts in the Preferred Masterplan extend far beyond the Poynings borrow pit (reference the green shaded areas on the map in the Preferred Masterplan, page 97) but Heathrow has not declared what this additional area in The Ivers might be used for. If this is to be a part of the re-provision of green space for public access, then information needs to be provided on how this would be developed and managed.
18. **We are strongly opposed to any development in Richings Park and Iver that will bring environmental impacts, specifically noise, HGVS and other traffic, emissions and dust pollution.** We will object to any development in Richings Park that will remove our green spaces and impact on our quality of life.

Poynings Borrow Pit

19. **We are strongly opposed to any form of construction in this quiet residential area, which is bordered by private roads with limited public access, due to the massive impact it will have on our quality of life and property values,** which is acknowledged by Heathrow in its Preferred Masterplan, section 7.7.
20. Furthermore, we are not confident that the issues associated with the proposed Poynings borrow pit or its after use have been thought through because:
 - a. Heathrow's plans for the area are unclear – it is variously show as a permanent lake or a green flood relief area
 - b. The impacts associated with the proposals either during construction or afterwards have not been thoroughly assessed and mitigated
 - c. There is no explanation of how much noise can be expected, which properties will be affected and by how much, and what specific mitigation is proposed for those most affected
 - d. There is no clarity over Heathrow's intentions for the site after the construction work is complete and how the public open space would be accessed and managed.
 - e. This area is already liable to flooding, there is no information about how is this going to be managed
21. Our reasons are provided below.

Access and transport

22. It is not clear in the consultation documents how much material Heathrow propose to excavate from this site and hence, how big the borrow pit would be. Nor is there any clarity on how the material would be transported from the borrow pit to the project construction site, and how many HGV movements would be required. The proposed borrow pit is bordered by the M4 and M25 to the south and east, and private (minor) roads to the north and west, so is effectively landlocked.
23. In the Updated SDR, Document 4, Chapter 10, Section 10.5.13 there is mention of using Old Slade Lane Bridge or a new temporary bridge over the M4 in reference to a number of other 'opportunity sites', but without mention of The Poynings site. We have been told verbally by Heathrow that Old Slade Lane bridge could be used for transport and equipment access, but it would not have sufficient structural strength for heavy goods vehicles. Whilst the bridge will be replaced by Highways England as part of the M4 Smart Motorway Project, it will be a like-for-like replacement and not upgraded to carry HGVs. The risk of any upgraded or new bridge at this location is that other authorities or developers could see this as an opportunity in the future, after the airport construction is complete, for access across the M4 and would run HGV traffic through our village on a permanent basis.
24. The Preferred Masterplan states that temporary roads will be developed to transport earthworks to reduce effects on local roads (section 4.2) but there is nothing specifically mentioned for the proposed Poynings borrow pit.
25. In general construction terms, there is mention of dedicated bus services for workers in the Richings Park document, together with dedicated temporary car parks and managed areas within the site for workers who bring their own caravans (page 12). Where would these be located in Richings Park and how would they gain access to the site? There is also mention of materials and waste movement by rail via the Colnbrook rail terminal, but this is not accessible from Richings Park.
26. The Preferred Masterplan mentions traffic management measures and restricting traffic on residential roads (section 4.2) but there is no specific mention for the Poynings borrow pit. Overall number of vehicle movements is not given, but if construction vehicles were to be run through Richings Park and Iver, this would compound our current HGV problems and give rise to damaging impacts on quality of life, property value and air quality.
27. The Preferred Masterplan (section 4.2) states that access along residential roads for construction vehicles will be restricted; and in instances where access on residential and low classification roads is unavoidable, measures will be implemented to mitigate and manage negative effects, although there is no explanation how this will apply to Richings Park or the wider Iver area.
28. Given the aerial extent of the proposed borrow pit, it would require a significant volume of road haulage (similar to the Cemex gravel extraction site in North Park) and given that no specific plans have been proposed for HGV management, this can only mean a substantial increase in HGVs using our minor residential roads (on top of the excessive number of HGVs already traveling through our villages). This is totally unacceptable.
29. **We are strongly opposed to any bridge or road enhancement that would bring more traffic and HGVs through the Iver villages either during or after construction; and we are opposed to any transport arrangement that will bring additional traffic and HGVs to our already-congested village roads.**

Noise

30. The Richings Park document (page 13) states that there would be 24/7 working at the borrow pit and that Richings Park is likely to experience high noise effects (page 30) – insulation will be provided to reduce noise impacts for homes and community buildings where it is needed and in some instances, temporary re-housing, for example during periods of very noisy works. There is no explanation of the extent of this noise impact, ie who will be affected and by how much, and therefore, which residents would be in receipt of these measures. The PEIR Volume 1, Chapter 17 Noise and vibration, Table 17.66 states that screens will be provided at the site boundary, but the design of these screens is not explained, ie construction materials, dimensions and location; and neither is there any explanation of how much noise they will reduce. These statements are too generic to provide any confidence in the effectiveness of the mitigation measures at this site. This is causing significant blight for the surrounding residential properties and **we are strongly opposed to a 24/7 working schedule at a construction site so close to residential properties for such a lengthy period.**

After use

31. The Richings Park document (page 6) states that the borrow pit will not be backfilled, but will instead be used for flood storage, and will also act as a public open space when not flooded, although the public open space is shown as extending far beyond the site of the borrow pit. Some documents show this area as a managed lake controlled by hydraulic structures and others as a flood storage zone comprising reed beds, which means it would have to be backfilled. These are very different propositions – which of these options is being proposed by Heathrow? This area of The Poynings and Old Slade Lane is already liable to flooding but there is no information about how this additional flooding scheme will exacerbate or ameliorate the existing flood risk situation.
32. Whether a flood storage zone, public open space or both, how would this site be constructed? HGVs and earthmoving equipment would need to access the site for construction and these would inevitably have to travel through Richings Park/Iver village and potentially Old Slade Lane, but no details have been provided on this nor has any impact assessment been undertaken, but it is clear that the HGV traffic and construction work will have a significant effect on local residents far beyond the timeline of the borrow pit excavations. This area is already liable to flooding, but there is no mention of what the flood risk to adjacent properties might be once the food storage zone has been constructed. In fact, there is no information in the consultation documents to show that any of this has been impact assessed.
33. If this area were to become a public open space, how would it be managed and how would it be accessed by the public? The primary access route to this location is a residential road (Old Slade Lane) which is not designed for large volumes of traffic; and the borrow pit is bordered by private roads – there is currently no car parking available. What account has been taken of the additional traffic to this area in assessing the impacts? The Richings Park document, page 27, states that there will not be a ‘substantial increase in traffic on local roads around Richings Park as a result of expansion in 2022’ and that ‘noise from roads near to Richings Park is not expected to increase with expansion’ (page 28) but Heathrow is proposing to build a large country park in Richings Park and, by implication this will attract visitors to the area as well as maintenance vehicles; hence, there will be a significant increase in traffic and therefore noise on our local roads.

34. We have been told verbally by Heathrow that there are other potential schemes that they are considering for this area after the borrow pit is finished, but it is impossible for us to provide a response to these plans if they are not defined. These options should have been explained in the consultation documents together with the pros and cons, and their environmental assessment. **Heathrow must make it clear exactly what they are planning for the Poynings borrow pit site after construction is complete.**
35. **Any of these developments would also remove agricultural land, which would significantly impact on the economic viability of the farmer's business, which must be taken into account by Heathrow.**
36. **We are strongly opposed to any after-use development that will bring additional noise and traffic and flood risk to our local area.**

Flood control in Thorney, Richings Park and Iver

Thorney and Iver flood storage

37. There are a number of other flood storage areas identified in the Updated Scheme Development Report, document 4 of 5, that are proposed to be built in Thorney:
- a. **Thorney Mill Road to Railway** – The area between M25, Thorney Mill Road and railway line on the right bank of the Colne Brook is identified as a potential offline flood storage area for the Colne brook. This will require structures for control of the flood water.
 - b. **Thorney Lake** – Heathrow are proposing to expand the existing lake for additional flood storage capacity and possibly use the field as well
 - c. **Thorney Park Golf Course** – This area has been identified by Heathrow as a potential site for additional flood storage capacity, but no detail has been given on how this would be constructed as the site is not on the Colne Brook flood plain.
 - d. **Hunstmoor Farm** – 2 sites both north and south of Ford Lane, no details of the structures that will be needed to be constructed to control flood water.
38. Whilst Heathrow state that these are still under investigation and will be selected once the full impacts of the developing scheme, and updating of the environmental baseline, are understood, there is no information presented in the document on the potential impacts on local residents. Development of these sites will include excavation, construction of embankments and associated hydraulic control structures, although there is no clarity on what design features would be installed at each site.
39. Earthmoving equipment would be needed to construct these sites, as well as putting additional HGVs on our village roads to convey the excavated materials to/from site. Other material will also need to be imported via HGV for construction of the flood control structures. Given that the only access to these sites is through Richings Park/Iver (due to the width/weight restrictions on the roads into West Drayton) then it is inevitable that the earthmoving equipment and the large number of HGVs needed would have to travel through our village. Once the site is developed then there would be ongoing maintenance that would bring traffic to the area which is already overloaded. No account appears to have been taken of this when proposing these sites.

40. In fact, none of these plans appear to have been impact assessed for noise, traffic, pollution or flooding risks for adjacent properties, even at high level. The construction noise study area in the PEIR Volume 1-Chapter 17 Noise and vibration, Graphic 17.1 doesn't even include these areas. It suggests that this has been an entirely separate exercise that is not joined up with the rest of the design proposals.
41. The Updated Scheme Development report, document 4 of 5, section 1.8.20 states that 'Selection of the preferred combination can only be achieved once the full impacts of the developing scheme and updating baseline are understood. In practice, this will mean selecting a preferred combination of sites that ensure we have sufficient flood storage capacity to serve the scheme, allowing for the current uncertainties in both the design of the scheme and its impact on flood risk'. This is completely inadequate. The consultation documents should be presenting all the plans for our area, together with an impact assessment that takes account of the cumulative effects.
42. **We are strongly opposed to any development that will bring additional HGV traffic through Richings Park and Iver Village, pollution, flood risk, noise and any other impacts to local residents.**

Colne Brook diversion

43. In addition to this we note that the Colne Brook will need to be diverted around the northern side of the Thames Water sewage treatment works to accommodate the new runway, as well as the infilling (at least in part) of Old Slade Lake. The Preferred Masterplan, section 7.11, states that there 'will be changes to groundwater flow pathways in the underlying Lower Thames Gravels aquifer due to excavations and dewatering during construction'. Whilst flood storage in the Colne Valley is proposed and flood risk is being assessed to protect property, there is no evidence to show that the flood risk to homes in the Richings Park area, as a result of these works, has been considered. Neither is there mention of access (HGV movements) or construction noise impacts to the same residential properties. These works may be on the south side of the M4, but the negative effects can and will traverse the motorway impacting residents on the southern part of Richings Park.
44. **It is essential that any construction works south of Richings Park, on the other side of the M4, consider the impacts on residents in the Richings Park area.**

Rail freight

45. Heathrow is proposing to use the Colnbrook branch line ('railhead') of the Great Western Main Line for the import of bulk materials and aggregates and containerised goods for construction purposes (Construction Proposals document. Section 5.3.12). This will mean realigning the railway around the new runway, laying additional track and creating a large number of sidings on the new railhead site immediately north of the proposed north-west runway where it crosses the M25 into the Colne Valley. The line will be operational from 2022 and will be operated 24/7 with most of the services at night due to the limited rail capacity, especially with the imminent introduction of Crossrail.
46. Given that this site will be just 0.5km from residential properties in Richings Park, it is inevitable that noise, dust and air pollution carried on the prevailing wind will affect residents in this area during both construction and operation. There will also be an impact from light pollution. This will be in addition to the noise impacts from runway construction, plus other proposed sites around this area. It is extraordinary that these cumulative impacts on Richings Park residents have not be thoroughly assessed and suitable mitigation proposed.

47. Also, an increase in rail traffic on this line 24/7 will impact residents in Thorney Mill Road, although the volume has not been quantified by Heathrow. Currently this line is used only infrequently overnight, so any additional rail freight during the night will significantly impact these residents.
48. Construction support site (CS13) and railhead will become a massive freight exchange operation after the runway construction is complete, with huge warehouses operating 24/7. This will result in noise and light pollution for those in the south of Richings Park and permanent noise impact from the railway for residents in Thorney Mill Road. There is no mention of mitigation in the consultation documents.

It is essential that the impact of these plans (for both construction and operation) on Richings Park and Thorney is comprehensively assessed and suitable mitigation proposed. There must be routing agreements in place to ensure that none of the HGV traffic generated will travel via Richings Park and Iver.

Other construction works

49. There are plans for various works south of Richings Park on the other side of the M4 which have also not been assessed for impacts to residents in Richings Park but will bring noise, dust and light pollution in addition to impacts from all the other sites in Richings Park and Thorney. These include:
50. The **construction support site (CS13)** – this will be just south of residents in Richings Park, who will be impacted by its 24/7 operation. The M4 will not necessarily attenuate the noise, particularly during the night period when traffic falls silent.
51. **Demolition of power lines** – we note that overhead power lines will be demolished (sometime during runway construction in 2024-2026) that run through the south east corner of Richings Park at the proposed borrow pit location (Construction Proposals, Graphic 6.6) but this has not been made clear in the Richings Park document and no assessment has been made of how this is going to be achieved and the impact on our local residents. This and all the other construction impacts need to be comprehensively assessed to understand the cumulative impact on our area.
52. **Infilling of Old Slade Lake** – this will bring impacts to Richings Park in terms of noise, dust and light pollution. There is no mention of flood risk to the southern part of Richings Park whilst this operation is taking place, except to say that a ‘range of measures will be adopted during the construction phase to control potential risks to the water environment and local communities arising from earthworks activities’ (Construction Proposals, section 4.3.28). These impacts on our area need to be thoroughly assessed and made transparent to the public. It is insufficient to say that ‘these will be developed further, with relevant stakeholders, as our construction proposals mature further’ – residents need to understand what the possible outcomes might be so that we can respond effectively to this consultation. Previous activity in this area (extraction of gravel/land fill) had significant effects on the water table in Richings Park.
53. There is no mention in the consultation documents of noise impact in Richings Park or Thorney from any of these sites. The PEIR Volume 1-Chapter 17 Noise and vibration says that the assessed project noise sources for the DCO project include construction activities and traffic changes on roads and railways for both construction and operation, but there is no evidence of this for the Iver area.

54. Noise insulation will be provided for properties affected by construction noise above the noise threshold, but Heathrow have not said how much noise we can expect to hear nor who might be affected. However, if we can hear aircraft noise and ground noise from the current airport, then it is highly likely that noise will be heard from these construction sites.
55. **We are opposed to any development that will add construction noise impact and HGV movements in our village. The Environmental impact on Richings Park from all these proposed developments must be properly evaluated and mitigated**

Cumulative construction noise impact

56. The PEIR Non-Technical Summary, page 36, identifies Colnbrook, Poyle, Harmondsworth, Sipson and Harlington as being the only recipients of noise from runway construction. Some residents in Richings Park will be less than 1km from the new runway – this is equally as close as residents in Colnbrook and yet there is no consideration of the impacts of runway construction noise on Richings Park. There is no mention of noise effects on the same residents from construction of the borrow pit, railhead, construction support camp, removal of power lines or the infilling of Old Slade Lake; nor any mention of construction noise impacts from any of the proposed flood storage schemes in the Iver area. **It is imperative that the cumulative noise impact from all construction sources is assessed and a comprehensive mitigation plan established.**

Freight

57. We note that in the Preferred Masterplan, section 6.6, Heathrow states that ‘freight proposals are designed to minimise cargo vehicle trips and reduce the effects of those trips on the local community whilst improving the reliability and ease of use of cargo operations at the airport’. We are not convinced by this statement as there is no specific analysis of the freight operations in Richings Park and what effect there would be on these operations from an expanded Heathrow. Cargo capacity is expected to double with expansion, but there is no detail on how this will be handled once it leaves the airport. It is inevitable that given the haulage businesses we have located in the Iver area that more Heathrow-related HGVs will be on our roads. This would be in addition to construction traffic associated with the proposed borrow pit, ridgeway construction hub and flood storage zones. The full effect of this HGV traffic has clearly not been thought through or impact assessed.
58. Whilst we understand that at this preliminary stage the detailed traffic modelling may not have been undertaken for the entire Heathrow planned activities, we would expect the major construction zones and freight centres to have been included in the preliminary traffic modelling and some acknowledgement of this impact made in the consultation documents.
59. **Heathrow needs to undertake a specific assessment of existing local freight centres in collaboration with the operators to understand future logistics and to implement mitigation against the impacts of increased HGV movements. This needs to include a baseline survey together with a commitment to undertake monitoring during both the construction and operating phases. We are strongly opposed to any further freight or construction traffic in our area.**

Aircraft noise

Third runway

60. The Iver area, particularly Richings Park, will be significantly more affected by aircraft noise than we are now, as the new runway will be half as close as it is today – less than 1km from the nearest residents in Richings Park. This is acknowledged by Heathrow in the Richings Park document (page 30) which states that the new runway will bring 'an increase in noise from aircraft landing and taking off for the communities of Richings Park'.
61. The new runway will also be elevated by 3 to 5 metres with a variable profile so that it can cross the M25 (Updated Scheme Development Report document, 2 of 5, page 31) which means it could be visible from Richings Park and any noise screening we currently receive from the landscape will not be of benefit for operation of the third runway, although we note that it is possible to lower the M25 further than currently proposed (Updated Scheme Development Report document, 3 of 5, page 8).
62. With an elevated runway and with the number of flights at nearly double existing, aircraft noise will be very significantly higher in Richings Park. Whilst some noise modelling has been undertaken and there is acknowledgement from Heathrow that Richings Park will be affected by aircraft noise (Richings Park document, page 30) what is not clear is whether the modelled noise impacts take account of the elevated runway.
63. **It is essential that the elevated runway is included in the noise modelling studies and that reducing its elevation is considered as a measure to mitigate aircraft noise in Richings Park and Iver.**

Early growth

64. We note that Heathrow is proposing an additional 25,000 flights per year before the third runway is complete (preferred masterplan, section 5.4). Richings Park and Iver are already exposed to aircraft noise from the existing runways during take-off and landing, and from aircraft noise shadow once the aircraft is in flight. A baseline of this noise level is yet to be quantified and correlated with the modelled noise contours. Any increase in flights will make this position worse for both areas.
65. We disagree that 'total noise impact from the airport operating with early ATM growth is relatively small' (Early Growth document, section 3.3). 40,000 more people being exposed to noise above the daytime LOAEL and 3,300 people exposed to levels above the daytime SOAEL is not insignificant (Figure B2). Besides, this option cannot be fully assessed without the proposed flight paths (Independent Parallel Approaches, IPA) and should not be looked at in isolation.

New flight paths

66. It is disingenuous to present information on early growth (ie additional flights) and the third runway without showing the potential flight paths (or envelopes) and showing the respective environmental impact – it simply understates the effect of this operational change. Whilst the flight paths may be considered as part of another future process, it is simply deceitful to say that there will be no impact on local communities. On the contrary; many communities will be overflowed for the first time, potentially the Iver area, and will experience a significant increase in noise impact that has not been declared in the consultation documents. Heathrow states that it will bring forward its Noise Insulation Scheme as a mitigation measure, but how can this be properly applied if the full effects have not been evaluated?

67. Residents are being led to believe that there will be no impact from expansion, when in fact there will be due to the change in flight paths, both from IPA and the third runway. Even though there will be a consultation on these flight paths in the future, will this then retrospectively change the plans which have already been consulted upon and actioned?
68. Statements such as: 'The change in noise exposure as a result of an additional 25,000 movements is expected to be a negligible change ie less than 0.2 decibels and therefore not significant' (Early Growth document, section 4.3.5) are simply untrue when considered in the context of the entire scheme, which includes changes to flight paths to facilitate this early growth. There will be a number of airspace changes to allow for both IPA and expansion, and these changes will bring a significant increase in aircraft noise to local communities, including the Iver area. Whilst the flight paths haven't been defined, the flight envelopes shown in Heathrow's earlier consultation this year, show potential flight paths over the Iver area as low as 4,000 to 5,000ft. This cannot be looked at in isolation. This is salami slicing the environmental assessment and very deceptive.
69. The environmental assessment should take account of **all** the impact from both on-airport operational noise and aircraft overflight noise in one cumulative evaluation, even if the flight paths are not fully defined – the worst-case scenario could still be evaluated. When taken together, the overall impacts will be very much worse for Richings Park and Iver and Heathrow would therefore be obliged to take a different stance in our case for mitigating or compensating the effects. Our concern is that they will be viewed in isolation and the cumulative effects not considered, so that Richings Park and Iver residents will not get the mitigation or compensation they need and deserve. **Even if the consenting processes are separate for expansion and airspace change, Heathrow must carry out a joined-up evaluation of the environmental impacts so that the cumulative effects are properly mitigated or compensated, with a commitment to implementing these before any increase in ATMs. Any plans for mitigating increased noise from early growth of the airport must include the Iver area.**

Respite

70. We object in the strongest possible terms to the proposed modes of runway alternation (Preferred Masterplan, page 51). The new runway will be less than 1km from residential properties in Richings Park. We already receive significant noise shadow from aircraft departures and landings on both runways, but particularly from the northern runway and when on easterly operations with prevailing winds. With the proposed mode of runway operation, there will always be aircraft either arriving or landing on one of the northern runways which will leave us without any respite. The Future Runway Operations document, page 5, states that the proposed runway patterns would 'guarantee predictable respite patterns for all of our communities'. This is a false claim. Residents in Richings Park and Iver will hear noise from aircraft as they land and take-off from the current runways, plus more from the third runway which will be much closer to our villages. **We will get no respite at all in Richings Park and request that Heathrow must put in place measures to ensure that residents here get the same access to respite that are proposed for other communities round the airport**
71. The Future Runway Operations document, page 91 shows that Langley's respite will reduce from 100% to 45%. This will also apply to Richings Park with aircraft noise shadow. In fact, what these diagrams show is that improvements are marginal or worse for most communities and that the proposed runway alternation largely favours those communities beneath the southern runway – how is this fair? There is no mention of how communities adjacent to the airport, and who experience noise shadow, will be impacted by these proposals. This should be made clear in a similar diagram.

72. We are also particularly concerned to be informed verbally by Heathrow that respite is only planned for communities that are overflowed and not for those that experience noise shadow. If this is the case, then Heathrow must make this absolutely transparent and devise plans to provide relief for those residents who are significantly affected in other equally-impacting ways by aircraft noise ie noise shadow from aircraft during take-off (start of roll), landing (reverse thrust), on approach and immediately after departure, as well as ground noise.
73. The other operational methods that Heathrow is proposing to reduce noise impact (steeper approaches, increased departure climb gradients, runway separation and length, displaced thresholds) will make no difference to Richings Park (The Future Runway Operations, page 6). In fact, displaced thresholds and steeper approaches, whilst being lauded as a method of mitigating noise, will create more noise shadow for Richings Park as the aircraft will be higher as it leaves the airport.
74. Appendix D of the Future Runway Operations, section 4.10.1 states that 'one runway will be dedicated for early morning arrivals, for aircraft landing between 05:15 and 06:00' but which runway will this be and which direction? If it is always a northern runway, then there will be no early morning respite for Richings Park and Iver.
75. In fact, easterly operations will make noise in Richings Park much worse and this could potentially increase from the current 30% to 50% of the time (directional preference, Preferred Masterplan, page 59). This will be on top of the ground noise from aircraft moving around the airport. There will be no respite for Richings Park residents from either aircraft noise shadow (from departures and landings) or ground noise at any time of the day.
76. Table 17.66 (PEIR Volume 1, Chapter 17 Noise and vibration) cites these measures as providing aircraft noise mitigation for Richings Park and Iver: 'These effects are reduced by mitigation measures (package of aircraft noise control measures and noticeable or valued respite from runway alternation). This clearly demonstrates that the noise impact in Richings Park and Iver has not been considered and the effectiveness of the proposed mitigation measures has not been thought through.
77. Richings Park falls within the noise contour described as Lowest Observed Adverse Effect Level, LOAEL (Preferred Masterplan, pages 76 and 77) which means that 'noise is likely to be noticeable and maybe considered intrusive and Government policy requires such adverse effects to be mitigated and minimised'. In this document Heathrow has acknowledged that 'significant effects from aircraft ground noise have been identified for some residents adjacent to the new runway and taxiways', therefore, we expect to see a customised mitigation plan that is tailored to the need to Richings Park.
78. **It is essential that Richings Park and Iver are included in any plans for respite or other noise control measures and if Heathrow believes its proposed aircraft noise control measures will help mitigate aircraft noise in Richings Park and Iver, then their effectiveness must be demonstrated.**

Ground noise

79. Heathrow has recognised that there will be ‘significant effects due to aircraft ground noise for those in Iver and Richings Park’ (PEIR Non-Technical Summary, page 37). Whilst Heathrow has identified a ‘precautionary LOAEL’ which covers the whole of Richings Park village (PEIR Volume 1, Chapter 17 Noise and Vibration, section 17.4.24) we find it extraordinary that the modelled LOAEL area shows only the southern section of Richings Park to be affected by ground noise, when it is already heard right across Richings Park with only the two existing runways. In fact, Heathrow has already validated, through noise monitoring in Richings Park, that ground noise (engine testing) can be heard from Hatton Cross. This is further than the 1km spatial extent that has been considered for the ground noise modelling study. Added to this, the new runway will be less than 1km from the nearest houses in Richings Park, so it is inevitable that the whole of Richings Park will be significantly affected by ground noise from an expanded airport. **The results from the ground noise monitoring survey must be taken into consideration by Heathrow in its modelling of ground noise impacts from the third runway and appropriate mitigation provided**
80. Heathrow has stated that the negative effects from aircraft ground noise in Richings Park and Iver will be mitigated by boundary screening and noise insulation (PEIR Non-Technical Summary, page 37).
81. With regard to noise insulation, whilst the PEIR Non-Technical Summary states that it will be one of the measures for reducing ground noise in Richings Park, the PEIR Volume 1, Chapter 17 Noise and Vibration, Table 17.23 contradicts this statement as it says noise insulation will only be provided for homes expected to exceed the SOAEL. So, which is it to be for Richings Park? Given all the noise impacts that Richings Park will be exposed to from an expanded Heathrow, as well as ground noise, it is extraordinary that Richings Park is excluded from this compensatory scheme which is designed to make life a little more bearable for those impacted by all this noise. Therefore, **Heathrow must reconsider its position and include Richings Park in its noise insulation scheme.**
82. With regard to boundary screening, the Preferred Masterplan, Section 3.9 states that ‘in the north, a large earth embankment may combine noise mitigation and visual screening’, whilst on page 78 it states that Heathrow is ‘designing noise screens around the airport to provide a barrier for communities nearby from aircraft ground noise and controls over where and when aircraft maintenance activities can take place’. We interpret noise screen as something similar to the noise wall in Longford, although this statement isn’t entirely clear, so which is it to be – a bund or a wall?

83. Also, where is this noise barrier to be located and what would its dimensions be? There is nothing in the consultation documents to explain where or how it would be constructed. The Preferred Masterplan, Section 3.9 also states 'we have also embedded in our design things like noise barriers to protect the closest communities from ground noise at the airport' (section 7.4) but does not explain who is to benefit? We assume that Richings Park will be a beneficiary of this noise barrier as the Richings Park document (page 30) states that 'when there is no noise overhead, there may still be noise from aircraft on the ground and to reduce ground noise, we are proposing to build noise barriers around the airport'. However, we have seen nothing in the documents to demonstrate the effectiveness of such a barrier. If Heathrow is making bold claims about reducing ground noise in Richings Park with a noise barrier, then it must be substantiated with evidence of how much noise it will reduce and over what spatial extent. We understand from Heathrow's noise experts that the noise barrier in Longford is only effective for a small adjacent area very close to the wall, so we fail to understand how such a barrier could be effective for Richings Park. **Heathrow must provide design and location details on the proposed noise barrier, complete with a demonstration of its effectiveness.**

Impact on traffic

84. **With reference to TPIR Vol. 6 Highways, we have no confidence in the assessment of airport expansion on traffic in South Bucks and, specifically, The Ivers Parish.** The baseline AADT figures quoted for traffic overall and for the HGV component do not reflect the current situation on the ground. Projections have increased traffic flows (including HGVs) in 2035 of 500-2,500/day on roads that have 7.5 tonne weight limits and there are projections of traffic flows of 5-10,000/day on parts of roads only where there is no option but to continue along the entire length. Five-points roundabout has been relocated to Slough. **Added to this, the document repeatedly states that the impact of construction traffic has not been assessed, merely surmising that its impact is likely to be no worse than that when the expanded airport is operating in 2035. Given that The Ivers Parish is likely to be seriously impacted by construction traffic, how can we place any confidence in the document's projections?**
85. The document shows little understanding of the road system in The Ivers Parish. Most of the roads are narrow and semi-rural in nature and fail to cope with existing levels of traffic, especially given the high proportion of goods vehicles. A number of the roads have 7.5 tonne weight limits and there are width restrictions on Iver Lane and Thorney Mill Road. This limits the options for HGV traffic. The low bridge at Station Road, Langley places a further constraint on routes to the west. The Mansion Lane/Hollow Hill Lane route to the south is limited by height and weight restrictions and, in any event, is due to be closed by Network Rail for construction of the Western Rail Link to Heathrow and yet the TPIR projects traffic flow rates of 10,000/day along this major north-south route in 2035. **Analysis of the impact on roads in The Ivers Parish must include major changes to the road network planned for the intervening period.**
86. Graphic 24.17 and 24.19 display further ignorance of the road system. Change in flow rates to 2035 of 500-2,500/day are projected for Thorney Lane, Thorney Mill Road, High Street and Bangors Road South. Already, these roads are operating beyond capacity. Thorney Lane North has the highest density of non-motorway HGV traffic in Buckinghamshire and Bangors Road South has a 7.5 tonne weight limit. Graphic 24.20 cites ≥ 500 HGV movements per day on roads with 7.5 tonne weight limits. **Traffic analyses must take into consideration the realities of the road system, not some myopic, desk-based notion.**

87. Graphic 25.1 suggests a fall in baseline traffic in South Bucks from 2015-2022. At best, this is highly implausible and, **as with all the projections in the document, no supporting evidence or explanation is provided.**
88. Graphic 25.3 suggests that there will be a 50% decrease in baseline airport-related vehicle kilometres in South Bucks to 2022 and no net increase With Project. Again, **the underlying assumption is highly implausible and, given that the area would be heavily affected by construction traffic, it ignores the real impact.**
89. Graphic 25.5 (and elsewhere) acknowledges that there are a number of key areas of the highways network in The Ivers Parish having V/C ratios of >100% or 85-100%. The document cites a range of percentage increases in traffic volumes as follows: *“25.2.19 Changes in network operation of up to 5% are considered to represent limited or minimal change. For the purpose of summarising network operation, changes between 5% and 10% are classified as small; changes between 10% and 20% have been classified as modest, while changes over 20% are classified as large.”* **The Department of Transport has recognised that percentages are misleading because the impact of any percentage change in traffic flows is dependent on existing levels. Given that many roads in The Ivers Parish are close to or above capacity, any increase will have a highly significant impact.**
90. The document makes a number of unsubstantiated claims and assumptions. In para. 25.4.11, it states *“Given that 2035 is likely to represent the worst case in terms of network usage and operation, it is reasonable to assume that network operation on roads to the northwest of the airport will be no worse than it is forecast to be in the 2035 With Project scenario.”* **How can it be assumed that, if the 2050 target of 142m passenger movements per year is achieved, there will be no material change in airport-related travel demand on the highway network?**
91. Given the aspiration of a 100% increase in freight movements associated with the expanded airport, we are astonished that there is no specific reference to the goods traffic associated with this scenario. This would be expected to have an enormous impact on traffic in South Bucks.

Active transport

92. In PTIR Vol.4 Active Transport, Graphic 4-7 indicates that Richings Park has ~300 airport-related employees / 500m². There is no public transport link from The Ivers to Heathrow and yet no consideration is given to including the parish in the hub and spoke concept for active transport. This is in contrast to Slough and points further west. **The Ivers Parish should be included in this scheme.**
93. Rights of Way. It is acknowledged that these provide a vital part of the green infrastructure to be developed alongside the airport expansion although there is little consideration of this network within the Ivers and the opportunity to enhance connectivity is missing. There will be 2 public rights of way in The Ivers affected by the construction of the proposed flood storage schemes. **It is essential that these are re-opened as soon as possible post construction and properly restored and enhanced.**

Mitigation and compensation

94. **Wider Property Offer Zone** – We note in the Preferred Masterplan, Section 10, page 95, that properties within close proximity to the proposed new boundary of the airport that would be affected by the project are included in the Wider Property Offer Zone and hence, eligible for compensation. Given that the new runway will be less than 1km from residential properties in Richings Park, plus all the other construction activities that are proposed for the Iver area, we find it extraordinary that Richings Park is excluded from the Wider Property Offer Zone. In contrast, Heathrow are arranging a special compensation arrangement with the residents of Stanwell Moor, who are in a similar location to Richings Park/Thorney but will not be as severely affected by expansion. **It is essential that Heathrow includes Richings Park for compensation as part of the Wider Property Offer Zone and that we are treated at least equally as the residents of Stanwell Moor.**
95. **Noise insulation** – We note that in the Preferred Masterplan, page 79, Heathrow has committed to providing noise insulation for eligible properties that will be most affected by noise during construction and operation of the expanded airport (and this is confirmed in Table 17.66 of the PEIR Volume 1, Chapter 17 Noise and vibration) and this is reiterated in the Richings Park document (page 31). However, there is no clarity on which properties this would apply to in the Iver area, which suggests that the noise impacts from all these construction activities have not been thoroughly assessed.
96. **Community fund** – The Proposals for Mitigation and Compensation document, page 32, gives various examples of where the community fund might be spent, such as areas close to construction sites, areas with roads used by construction vehicles and areas close to the airport itself. Given that Richings Park will be less than 1km from the new runway and there are all these other construction sites identified that would have a significant negative impact on our quality of life, it is extraordinary that there is no mention of this compensation for our area. It suggests that very little consideration has been given to the environmental effects and that this is very poorly studied and understood.

Transport and parking

97. **Taxis** – The Preferred Masterplan outlines measures to reduce journeys made by taxis and private hire vehicles and, whilst we welcome this initiative, there is no mention of provided 'off-street' waiting areas for taxis that are starting their journeys. The villages around Heathrow have seen an increase in unofficial taxi waiting zones since Heathrow introduced measures to stop taxis waiting in airport car parks. This would only get worse with further restrictions imposed by Heathrow; therefore, **arrangements need to be made to stop taxis and private hire vehicles for using our villages as waiting areas.**
98. **Airport parking** – In this document (section 3.7) Heathrow states that no significant increase in airport parking will be provided. However, the net effect of this is that people will look for car parking in the villages on the outskirts of the airport. We already have a problem in Richings Park with vehicle parking on the streets for the airport, for weeks on end. There is a similar pattern in other Heathrow villages. We also have numerous unlawful airport parking operations springing up on every available patch of land. What arrangements will Heathrow be making to ensure this does not continue or get worse? There is no acknowledgement of this problem in the consultation documents and hence no proposal for mitigation. **Heathrow must make a commitment to prevent airport parking in the surrounding villages.**

99. HGV parking – HGVs regularly park in our streets whilst waiting to be called up to the airport, with attendant antisocial behaviour. This situation occurs in other Heathrow Villages and is intolerable. There are two proposed cargo call-up areas in the documents, but only one of these is due to be brought on stream in the first phase and will not be adequate to deal with the size of the problem. The Consultation Document (section 3.6) states that expansion will double cargo capacity, in which case **Heathrow must ensure that sufficient call-up areas are built in advance of this cargo expansion and act to effectively prevent HGV parking in our villages.**

Air pollution

100. There is a conflict between the statement in Heathrow Expansion in your area – Iver and Richings Park which states that any increases in pollutants will not be significant and the Air Quality and Odour chapter which predicts that the AQO will be exceeded. The Heathrow in your area document is oversimplified and misleading.
101. In the PEIR Volume 1, Chapter 7 Air Quality and Odour, Heathrow acknowledges that in 2022 the maximum total concentration of NO₂ within Iver and Richings Park with the DCO Project is 48.9µg/m³, which is above the AQO; and that the two receptors are predicted to experience moderate adverse impacts. It is not clear, however, what emissions have been included in this modelling. Given that no plan has been proposed for HGV and traffic management in Richings Park, then it suggests that insufficient account has been taken of vehicle exhaust emissions in the air modelling study and hence the conclusions are most likely to be underestimated. Air quality monitoring results for Richings Way recorded 42 µg/m³ in 2017 and this had increased by 140% on the previous year due to an increase in traffic volumes and SBDC subsequently implemented an AQMA for the Iver area. If Heathrow were to run more HGVs through the Iver villages, either from The Ridgeway, Thorney, Huntsmoor or The Poynings, then air pollution would significantly increase with some receptors far above legal limits.
102. The PEIR Non-Technical Summary, page 29 states that ‘the cumulative effect of other schemes that would also be expected to affect air quality, such as the Lakeside Waste Management Facility and the Western Rail Link to Heathrow will be considered.’ This is a key requirement for environmental assessment associated with any development. The Lakeside Energy from Waste plant will be relocated closer to Richings Park and we have been informed by the operators that there will be an increase in NOX emissions in our area. However, there are confusing and contradictory statements in the PEIR Volume 3, Chapter 7 Air Quality and Odour Appendices. Section 6.1.1 states: ‘Emissions from the Lakeside Waste Management Facility in the baseline and future baseline scenarios have been modelled using the ADMS-5 model’, whilst section 6.1.3 states: ‘The ‘With DCO Project’ scenarios have assumed no Lakeside Waste Management Facility to be in place’. Have these cumulative emissions been modelled by Heathrow or not?
103. Also, we cannot find any evidence in the documentation that account has been taken of emissions from construction equipment in Richings Park and yet the Preferred Masterplan, section 7 states that the ‘greatest effects are likely to occur in areas to the north west of the existing airport, where earthworks will be required to prepare for the new runway, as construction sites will be established in this area, which will result in construction vehicle movements and emissions’. This is particularly relevant to The Poynings site where local residents are impacted by pollution from the M4 and will be affected by the Lakeside EfW plant and construction work at the proposed borrow pit. Where is the analysis of this and the subsequent mitigation plan? What account has been taken of the prevailing wind direction towards Richings Park?

104. Richings Park and the Ivers already have a very high percentage of HGVs on their narrow residential roads. Expansion will significantly increase this both during construction and operation with increased freight movements. There is no assessment of the impact of these additional HGV movements on the already poor air quality experienced here.
105. Heathrow states that 'aircraft on approach and departure from Heathrow have a limited impact on ground-level concentrations of NO₂, PM10 and PM2.5 beyond the Airport boundary (PEIR Non-Technical Summary, page 28)' but the new runway will be less than 1km from Richings Park. There will also be construction traffic and the Lakeside EfW plant will be much closer – all of this will increase pollution in Richings Park, but there is no reference to any action being taken to do any air quality monitoring or to involve SBDC and yet, Heathrow acknowledges that Richings Park has an AQMA. **A baseline survey needs to be established in Richings Park now so that any impacts from the expanded airport can be measured both during construction and operation and an adequate package of mitigation measures put in place.**
106. The PEIR Non-Technical Summary, page 29 concludes that 'the DCO Project is only predicted to raise NO₂ levels at a small number of receptors and given this, the temporary nature of construction effects and the further work that will be done to manage road traffic during construction, no significant effects in relation to NO₂ levels are predicted during the construction phase'. The Richings Park document (page 28) also states that 'there will be increases in pollutant levels associated with expanding the airport, but these are not considered to be significant. Levels of all pollutants will be within the levels set by the Government to protect health'. **We strongly object to both of these statements given that there is no comprehensive plan for management of construction traffic in Richings Park.**
107. In relation to odour, the PEIR Volume 1, Chapter 7 Air Quality and Odour, section 7.9.12 states that only 47 odour complaints were received between 2014 and 2018, and that these are 'most likely to be due to emission sources not associated with the Airport, and could also potentially relate to activity at other airports'. This is certainly not the case in Richings Park. Just because Heathrow hasn't received odour complaints from residents in Richings Park doesn't mean there haven't been any. In fact, SBDC has received many complaints about fuel odours from Heathrow airport (and this cannot be from any other airport) over many years, but Heathrow has clearly not engaged with SBDC to establish the number of complaints they have received. The Richings Park document (page 28) states that 'The smell of aviation fuel may be noticeable at locations closest to the airport during certain weather conditions' and that 'activities which create odour will be located away from communities where possible'. What does this mean in real terms for Richings Park?
108. The document also states that 'some different local communities may experience annoyance under specific weather conditions, but this will be occasional and short-term and this effect is considered to be not significant'. Heathrow is not in a position to draw this conclusion when it has not gathered the evidence from SBDC (and possibly other councils) which shows residents in Richings Park experiencing health effects from aviation fuel odours.
109. The PEIR Non-Technical Summary, page 29 states that 'baseline odour surveys and monitoring of baseline PM and dust deposition levels would be undertaken before the start of construction' but does not say where these will be undertaken. **Given the evidence presented above, it is essential that Richings Park is included in this baseline survey and ongoing monitoring.**

110. Whilst the Preferred Masterplan, section 7.3 acknowledges that there will be 'potential for health effects, specifically for those who are vulnerable to changes in air quality, such as younger people, older people and people with existing poor health' we cannot find any evidence in the documentation to show that any analysis has been done on this for Richings Park.

111. It is essential that:

- a. Heathrow undertakes a comprehensive air quality study that takes account of all the cumulative forecast emissions in Richings Park
- b. Heathrow commits to undertaking a baseline survey of air quality in Richings Park and ongoing monitoring of air quality during both construction and operation
- c. Heathrow assesses the impact of air pollution on vulnerable people in Richings Park
- d. Heathrow implements a comprehensive action plan for managing pollution levels in Richings Park
- e. Heathrow takes account of the odour complaints in Richings Park and implements measures to mitigate the effect.

The Heathrow Air Quality Working Group engages with SBDC on future air quality management in Richings Park

Green Belt

112. Re-provision of green belt/open space must be explicitly included in the plan and not include the areas in Richings Park and the Ivers which are already green belt/open space as this would in effect be double counting.

113. How is the proposed country park round Richings Park going to be managed? It is a significant size and it should not be a burden on the local community. **Proposals should be included within the DCO for its management by Heathrow in perpetuity.**

114. Much of the land around Richings Park that is shown as re-provisioned green space/diversity land is not within the DCO red line. It will therefore not be under the control of Heathrow and **therefore it needs to be made clear how its delivery both in the short and long term is to be secured.**

Economic Loss

115. The flood relief schemes will result in the loss of valuable farming land and will deprive the tenant farmers of their livelihoods. The Thorny Golf Course will also disappear. All of this will lead to the loss of jobs and contributions to the local economy as well as the national economy in terms of food production. This is not acknowledged in the documentation and no indication is given as to **how mitigation is to be provided for the local economy. The loss of the local golfing amenity also needs to be addressed**

Heritage

116. There is no information in the consultation documents on the heritage landscape in Richings Park and hence no assessment of how these should be protected. For example, part of the Richings park golf course is located within the planned DCO red line area, but it has not been listed as a heritage asset, which it should be. **Heathrow must identify all the heritage sites within the DCO red line area and explain how they could be affected and what they will do to protect them.**

12th September 2019

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