

Heathrow Airport Expansion Consultation



The Buckinghamshire and Milton Keynes Natural Environment Partnership

The Buckinghamshire and Milton Keynes Natural Environment Partnership brings together local authorities and organisations from across the public, private, health and education sectors, as well as conservation and community organisations to champion the value of the Buckinghamshire environment in decision-making, and to encourage environmental protection and improvement for multiple benefits – for the environment, businesses and the economy, and the health and wellbeing of communities and the society of Buckinghamshire.

We welcome the opportunity to comment on the current Heathrow Airport Expansion consultation.

Our response to the consultation is necessarily strategic at this stage and emphasises the areas of work we are currently prioritising to achieve the NEP's objectives in Buckinghamshire and Milton Keynes:

- Green Infrastructure and Health – we set out in 2016 a Vision for Green Infrastructure (GI) improvement for Buckinghamshire and Milton Keynes to provide, connect, improve and protect GI across our area. We are currently producing a GI Opportunities map to show broad areas of opportunity for green infrastructure;
- Biodiversity accounting – to help ensure net biodiversity gain as a result of development in Buckinghamshire and Milton Keynes.

We urge Heathrow Airport Limited to consider carefully the points we make below, which are essential to take account of in determining the location, design, nature and operation of the proposed scheme and to deal appropriately and sufficiently with its environmental impacts.

Our response

The NEP welcomes the recognition at Section 4.6 (Natural Environment) of the consultation that the expansion of Heathrow will affect the existing natural environment. Provided such development is conducted appropriately, we also recognise that such expansion could present “...an opportunity to deliver high quality mitigation around the airport for biodiversity, landscape and the water environment” – for the benefit of local communities and wildlife; and to “... create better, well-connected green infrastructure....”

However, should the expansion go ahead, there are potentially large-scale and multiple impacts on the environment felt over a wide area, as a result of runway and airport expansion and ancillary development, transport and infrastructure works – that would have potentially significant negative

environmental impacts as a result of land take, diversion of rivers, loss of habitats and green space – with consequences for people and wildlife in the immediate vicinity and beyond.

The NEP therefore calls for Heathrow Airport Limited (HAL) to commit to an approach that minimises harm to the environment; which prioritises early and strategic planning of green and blue infrastructure, recognising its importance alongside built infrastructure; and that throughout design, construction and operation, opportunities to enhance, expand and connect green infrastructure and enhance biodiversity are explored fully.

Furthermore, we call for an early assessment of, evaluation of impacts on, and appropriate responses to, environmental assets and the benefits and services they provide and could potentially provide – that recognises the full impacts of the various options and which is based on robust and complete information.

And we ask HAL, in line with recent government strategy and practice, to commit to long-term measurable net gain in biodiversity as a result of development, secured for the lifetime of the development, and make use of a recognised biodiversity accounting metric; alongside a commitment to working closely with environmental stakeholders at all stages to help develop options, design and solutions that achieve the environmental aims.

The whole value of the environment and the benefits it provides should be taken into account in decision-making

The consultation highlights the importance of on the economic need for airport expansion and the resulting impacts on communities. The NEP wishes to emphasise the importance of environmental considerations, and the reliance of both the economy and people on environmental assets and the services they provide.

For example, assets such as green space, wildlife, water and soil are essential to people and businesses – because they are not only assets that are valued in their own right, but because they provide services that benefit all of us -such as water quality regulation and flood risk alleviation, air quality regulation, carbon sequestration and habitats and green spaces for wildlife and biodiversity, and opportunities for physical and mental health and wellbeing including through recreation.

As such, the direct impacts of the proposed expansion on environmental assets, and on the services and benefits they provide, and the full value of potential negative impacts on them - must be taken into account in decision making.

This approach is in line with recent Government strategy

The UK Government has provided a clear steer towards such “natural capital” approaches recently, having produced key strategic documents that outline the critical importance of the environment as both an asset and as a provider of multiple services and benefits, as well as outlining the need for development to ensure measurable net gains in biodiversity and the need for environmental net gain. For example:

The Government's 25-Year Environment Plan (January 2018) - took a natural capital approach – taking the full value of nature into account in decision-making – *and includes the following commitments:*

- **Embedding the “Environmental net gain” principle for development** – including housing and infrastructure is the first principle in the document. The Plan includes a commitment to explore making this mandatory; with **an immediate ambition to mainstream the use of existing biodiversity net gain approaches** – update tools, reduce process costs etc. (See Section on Using and Managing Land Sustainably – [A Green Future: Our 25 Year Plan to Improve the Environment \(Page 33\)](#))

The National Planning Policy Framework (NPPF)

[Proposed draft NPPF text \(March 2018\)](#) is stronger in relation to the aim of biodiversity net gain from development – requiring a measurable net gain in biodiversity for all development. For example [not a full analysis; NEP's underlining]:

“168. Planning policies and decisions should contribute to and enhance the natural and local environment by: ...

d) minimising impacts and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;...”

“172. To protect and enhance biodiversity and geodiversity, plans should:...

b) ... promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity...”

National Infrastructure Commission report – [Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes – Oxford Arc](#) (November 2017) - Page 53 states:

“The development and infrastructure industry is moving towards employing a ‘net gain’ approach to biodiversity and natural capital...”

“Embedding ‘net gain’ into development is about seeking to maximise the value of natural assets as an integral and strategic part of placemaking and growth, rather than a compensatory add-on.

“Achieving these ‘net gains’ is more than simply replacing and outweighing losses with gains – it also requires doing everything possible to avoid losing biodiversity and natural capital in the first place.”

The NEP urges HAL to make five clear positive commitments to the environment

Expanding Heathrow will have both direct environmental impacts on the affected and surrounding environment, economy, communities and visitors – as well as indirect effects on the services and multiple benefits the environmental assets provide.

Appropriate and early consideration of the potential impacts of development on environmental assets *and services*, and commitments by developers to appropriate avoidance, mitigation and compensation, underpins any form of sustainable development.

Therefore - in determining the precise location and length of the runway, terminals, taxiways and other infrastructure; in determining road network changes; in trying to influence other airport-related development; and when considering landscaping – and, more importantly, biodiversity mitigation - **the NEP urges HAL to commit to the following during options selection and all future stages, to achieve its intended “cleaner, greener, quieter” Heathrow:**

1. Early and strategic planning for green and blue infrastructure to improve its quality, amount and connectivity to achieve multiple benefits

This is likely to include a thorough assessment of

- existing environmental assets – what exists (which should include protected sites and habitats as well as the many other assets), their benefits and services provided, and potential benefits and opportunities;
- the impacts of development options - to existing environmental assets and the broader services they provide to local and wider populations;
- how to minimise the impact with each option on protected areas and land take of key wildlife and recreation areas such as the Colne Valley Regional Park
- how to maximise net environmental gains and opportunities for improvement (for example, in green infrastructure and biodiversity) as a result of development; looking at both the direct and indirect impacts of expansion proposals; looking beyond the immediate boundaries of the proposed expansion to identify opportunities; and taking into account likely works pre-, during construction and during operation.
- how to employ to employ best practice to integrate biodiversity and green infrastructure into the design of the expansion and related development.

HAL would benefit from setting out early a strategy for green and blue infrastructure as a result of development. We would urge consultation with key stakeholders to achieve this. We would point to our own [Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes](#) to assist with setting a strategic vision for green infrastructure. In 2016, The NEP collectively endorsed a Vision for Green Infrastructure in Buckinghamshire and Milton Keynes by 2030 that provides, connects, improves and protects our Green Infrastructure assets for their many benefits and into the longer term.

To achieve the Vision, the NEP has set out Nine Principles that must be adhered to at all scales. The Principles emphasise how to retain and maximise multiple benefits from Green Infrastructure – for wildlife and for people. They advocate the need for planners and developers to recognise that Green Infrastructure is equally as important and necessary for

the social, environmental and economic health and wellbeing of our areas as man-made / constructed infrastructure.

The value of GI and its benefits must be considered and planned for early and strategically at all spatial scales. Green Infrastructure must also be better-connected and linked together to create a green network – to maximise benefits for wildlife and provide access to promote health and wellbeing. All opportunities for creating and enhancing green infrastructure and connecting with existing GI should be explored as a required step in the planning process. This means GI creation and improvement must be coordinated with activities across-administrative borders, and linked to and support other policy objectives. GI functionality must be maintained with appropriate management into the long term.

By 2030 we want our Principles embedded to provide, connect, improve and protect our Green Infrastructure assets for their many benefits and into the longer term.

Currently, the NEP is working on a map to show strategic-scale broad areas of green infrastructure opportunities, to help illustrate the green infrastructure vision and principles for Buckinghamshire and Milton Keynes. The Colne Valley Regional Park is identified as one opportunity area – valued currently not only for its provision of green space to visitors and for its wetlands, water courses and lakes, and wildlife habitats – but also for its potential to connect areas of ancient woodland, enhance biodiversity and continue to provide public access and recreation to growing populations living around the park – along with all the associated broader environmental, health and wellbeing benefits. Any strategic green infrastructure plan for Heathrow must take account of the full value of this resource.

2. Assess and achieve long-lasting measurable net gain in biodiversity secured for the lifetime of the development

In line with good practice and Government policy, the NEP would like to see HAL set out a clear and direct commitment to achieving net biodiversity gain as a result of development. This goes beyond the current consultation statement that HAL is “...committed to ensuring current populations of animals and plants can be maintained” (Page 62).

The NEP urges HAL to proceed in line with good practice and use a recognised biodiversity accounting metric, based on the Defra metric or similar, and following the latest good practice guidance and methodologies to measure the likely and actual impacts of development on biodiversity and to set in place a plan to secure and monitor proposed biodiversity gains over the lifetime of the development.

3. Follow the mitigation hierarchy

To achieve an overall measurable net gain in biodiversity, HAL should follow a well-recognised sequential approach to likely impacts. The “mitigation hierarchy” ensures appropriate weight is given to trying to avoid negative impacts on biodiversity in the first instance through reviewing development location and design (avoidance) ; and then, once this has been done to its fullest, in sequence, to mitigating (first) or compensating on-site for anticipated negative impacts on biodiversity. Only when all options on-site have been exhausted should compensation be sought off-site – as a so-called biodiversity “offset”. The biodiversity accounting metric should be used to determine the quantity of offset needed.

Employing the mitigation hierarchy along with the latest best practice in biodiversity accounting will help to determine the amount and type of habitat likely to be lost (despite avoidance, and mitigation) and therefore the amount and type needed to be compensated for on-site and off-site.

4. Off-site compensation, where it arises, should be targeted to appropriate locations

The choice of off-site compensation sites and the nature of proposed improvements must take into account all available data and avoid inappropriate location or disturbance of ecologically sensitive sites.

When habitats are created for mitigation / compensation / enhancement through “biodiversity offsets” we also would expect these to be located locally and so as to maximise the creation of ecological networks, and with a substantial portion being directed to take advantage of, and into consideration, at least the following: priority habitats and species, location of priority areas for biodiversity and wildlife investment (for example, biodiversity opportunity areas), local wildlife sites, and opportunities to extend, enhance, create and connect habitats and green infrastructure for wildlife and people.

The identification of host sites and priority areas and selection criteria should be developed in conjunction with input from key local stakeholders, local schemes and priorities.

The NEP would also expect regular re-assessment post-works of the impacts on biodiversity, and the long-term management of offset sites should be provided for over the lifetime of the development - to ensure net gain is achieved.

5. Working closely with key stakeholders to minimise negative environmental impacts, ensure good design for environmental outcomes and and maximise environmental opportunities – at all stages of planning, development and future operation – and have due regard to their concerns and priorities for the environment – and the benefits it provides to all.

Concerns are likely to cover direct and indirect impacts on natural assets – including specific habitats and wildlife, access to green space, the functioning of surface waterways, lakes and rivers, flood plains and groundwater and wildlife sites of importance, impacts on air quality, landscape, noise and tranquillity, for example over the Chilterns AONB.

Local stakeholders involved should include at least all Local Nature Partnerships surrounding the area, the Chilterns Conservation Board and the Colne Valley Regional Park – for example to help advise on:

- good design – for example, the integration of biodiversity and green infrastructure into development, including the use of SuDS and the biodiversity opportunities they bring;
- ensure any works and compensation integrates with existing priorities, habitats, environmental functions and benefits;
- to help identify opportunities for environmental gain, and the positive benefits resulting from it, are taken.

Robust, complete, accurate and adequate environmental information is needed for decision-making

In relation to all the commitments outlined, the NEP urges HAL to ensure it properly and thoroughly collates the available ecological information to adequately characterise the area of development on which to base decisions. The NEP also urges HAL to take into account the impact of infrastructure and development on the distribution, nature, quantity, quality and connectivity of natural assets, their value and the benefits (services) they provide, and model the impacts on them of various infrastructure options and proposals and variations to find the best overall solution when determining the location and impacts of the scheme to maximise environmental gains and opportunities for all and minimise losses..

Our Standard Response to Buckinghamshire's emerging Local Plans also applies to major infrastructure development

The NEP would also like to refer to the points made in its [Standard Checklist Response to Local Plans](#). Although this document is targeted towards Local Planning, it provides a useful checklist to the principles and expectations the NEP has of good planning for all development and infrastructure – in relation to biodiversity, protected sites, ecological networks and green infrastructure in particular: from environmentally-sensitive route selection and construction, incorporating biodiversity and green spaces into development proposals and compensating / mitigating wherever needed; the protection and enhancement of river and stream corridors and slowing the flow, particularly using natural means, to reduce flood risk.

We would encourage HAL to review and adhere to its contents.

Summary

The NEP is keen to ensure all aspects of the environment and the benefits it provides to people, wildlife and the economy are taken into account in options development and any future stages of Heathrow expansion.

Overall, we hope that future proposals for Heathrow take into account all of our points set out in this response - the need to clearly identify and work to maximise biodiversity, habitats and ecosystem services benefits through clever and careful location and design of infrastructure (seeking to avoid impacts first, wherever possible, in line with the mitigation hierarchy); and during construction and operation - overall to respect and contribute to landscape requirements for more, better and better-connected green space for the benefit of people, the economy and wildlife.

Making the five commitments outlined above are essential to ensuring HAL achieves its intended “cleaner, greener, quieter” Heathrow.

We look forward to hearing from you further at future stages of the consultation process.