

## Heathrow Expansion DCO Consultation Response In Combination and Cumulative effects

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### 1. Overview

- 1.1 This paper sets out the Mayor's response on in-combination and cumulative effects to the statutory consultation by Heathrow Airport Limited (HAL) on its expansion proposals.
- 1.2 The assessments of in combination and cumulative effects included in the consultation material lack the detail and completeness expected at this stage of the process. It is unacceptable that more complete drafts of these assessments have not been completed for this stage and thus it is difficult to determine if the appropriate mitigations have been put forward.

### 2. In combination effects

- 2.1 The In Combination Effects Chapter sets out the proposed approach to the assessment, but the assessment itself is deferred to the Environmental Statement (ES). The approach proposed is complex and difficult to understand.
- 2.2 In most cases, the approach relies on in-combination effects on a single receptor type to be picked up in the individual chapter topics – this requires the individual topic chapter authors to have sufficient understanding of the other potential effects. A matrix of aspects is provided, which considers in-combination effects to be considered in each topic chapter.
- 2.3 The approach is lacking across the assessments, for example Historic Environment should consider in-combination effects from air quality, as poor air quality can cause damage to historic buildings and assets. It appears that the approach has been followed through in the individual chapter topics in the Preliminary Environmental Information Report (PEIR), to the level that is possible at this stage.
- 2.4 For human receptors, which are affected by numerous aspects, it is proposed that Community Impact Reports will be prepared. HAL propose that these not be available until the publication of the ES, so it is not possible to comment on this aspect as part of the statutory consultation response. It would be preferable to be given an opportunity to comment on these before the application is submitted so that changes can be made to it if necessary.

### **3. Cumulative effects**

- 3.1 The proposed approach for assessing cumulative impacts is provided in Chapter 5, but the assessment itself has not been undertaken at this stage. The proposed list of developments to be considered is presented only for comment. The proposed approach is based on identifying developments that fit certain criteria (e.g. consented or in the process of applying for consent) within a Zone of Influence. The proposed approach is limited to known developments. There is no consideration of the potential effects of economic growth in the area triggering increased development, or in particular the effects of the economic growth that is expected to be triggered by the proposals.
- 3.2 Although individual developments can't be identified at this stage (or indeed at ES stage), some consideration of the cumulative impacts of this growth should have been undertaken, as it is reasonably foreseeable (in fact it is predicted as part of the justification for the proposals) that it would occur. The Zone of Influence seems small, however given the nature of the area it is appreciated that there is a need to limit the study area in order to keep the assessment proportionate. However, outside the Zone of Influence, it should be possible to consider cumulative effects on a more generic scale using growth predictions etc. This may be an inherent part of the assessments (e.g. from traffic modelling), but it is not clear from the methodology that this is considered.
- 3.3 Overall, at present there is a lack of sufficient detail on the in combination and cumulative impacts of the development. As with the topic chapters, it is clear that HAL has not complied with its duty to provide information which is reasonably required to develop an informed view of the likely significant environmental effects (as per Regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017). HAL should therefore formally reconsult on the in combination and cumulative impacts once they have addressed the defects set out above. It is simply not acceptable not to provide adequate assessments and then proceed to an application to the Secretary of State.