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From: SPomeroy@groundwork.org.uk
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**Response from the Colne Valley Park Community Interest Company to CAP1819:
Economic regulation of capacity expansion at Heathrow airport: consultation on
early costs and regulatory timetable.**

Introduction

1. The Colne Valley Regional Park Community Interest Company (CVPCIC) provides this response to the consultation.
2. The CVPCIC is responsible for the Colne Valley Regional Park (CVRP). This is the first large taste of countryside to the west of London; an area for people, wildlife and many uses – recreational and commercial – including farming and angling. Founded in 1965, the park stretches from Rickmansworth in the north to Staines and the Thames in the south, Uxbridge and Heathrow in the east, and to Slough and the Chalfonts in the west. The CIC's locus is to protect and enhance the Regional Park through six objectives (see Annex at end of this note).
3. The CIC believes Heathrow expansion would have an entirely negative impact on the Park, wiping out almost a third of its southern end. For that reason it objects fundamentally to the proposals. In our view, the expansion plans pose the threat of an unprecedented impact on all of the Valley's rivers, compromising their eventual links with the Thames, and the loss of around 900 acres of the Park. This loss is focused entirely on statutory Green Belt that stands to lose even more land to the expansion, around 1,300 acres. We believe this degree of environmental impact is completely unacceptable.
4. In view of the scale of such an impact, the highest quality mitigation and compensation is absolutely essential, something that has been assured by government and specifically included in its Airports National Policy Statement, and by Heathrow Airport Limited (HAL). It is in the light of this impact, and previous assurances, that we respond to this consultation.

CVPCIC Response

5. We note that the CAA consultation highlights the significantly increased costs of the expansion project prior to HAL receiving a DCO. We do not wish to comment on the detailed proposals for cost recovery and further regulation, and recognise the proposals need to be subject to robust scrutiny, monitoring and control.
6. However, we comment and highlight as follows:
 - a) We ask for more transparency on costs and believe the "Steer" report should be made public. Local communities have been subject to many years of uncertainty and delay related to this project, which has blighted an area designated for protection and enhancement for the 'green' resource it offers the capital and local communities.



- b) We note in the consultation that the CAA has asked HAL to identify if and how costs could be reduced, if timescales for completion of the runway were put back by one year. The CIC welcomes more time for HAL to improve its scheme layout and design and for consultation on the project before formal submission, but is concerned at precisely how cost savings may be achieved, especially if those reductions are applied to what we view as essential environmental and mitigatory measures.
- c) We recognise the need for robust scrutiny of all costs and for value for money – but this value cannot be judged in purely monetary terms.
- d) It is critical that:
 - The project maximises and gives first priority to benefits to the natural environment and local communities, and delivers a legacy commensurate with the scale of the project and its hugely adverse impact on the area.
 - Any reduction in costs does not result in the diminution of the quality of mitigation proposals and the legacy provided for the natural environment and local communities.
- e) We highlight that the draft expansion proposal currently being consulted on by HAL involves significantly more land loss from the Colne Valley Regional Park and Green Belt than was implied in the illustrative scheme appended to the 2018 ANPS (and which was assessed by the preceding Airports Commission). Mitigation of this significantly increased impact requires a far greater extent and higher quality of improvement within the remaining Colne Valley Regional Park/ Green Belt area. However, we have yet to see any sufficiently comprehensive proposal from HAL in that regard. Significant additional investment in improvements to the natural environment will be needed to secure a fitting and appropriate legacy.
- f) The quality of this legacy must not be sacrificed in the face of pressure to reduce costs.

ANNEX

The six objectives of the Colne Valley Regional Park are:

- 1. To maintain and enhance the landscape, historic environment and waterscape of the park in terms of their scenic and conservation value and their overall amenity.*
- 2. To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.*
- 3. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features*
- 4. To provide opportunities for countryside recreation and ensure that facilities are accessible to all*
- 5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside*
- 6. To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.*