Friends of the River Crane Environment

Established 2003

DEPARTMENT FOR TRANSPORT CONSULTATION ON A DRAFT HEATHROW EXPANSION NATIONAL POLICY STATEMENT

RESPONSE BY FRIENDS OF THE RIVER CRANE ENVIRONMENT (FORCE)

AUGUST 2026

Executive Summary

This response is by Friends of the River Crane Environment. We are a Charity, established in 2003 with over 700 members, who have been engaged with Heathrow and various development proposals for much of that time. Our key points are:

- The direct impacts and risks of the 3R proposals are significant, with the potential to significantly degrade the local environment, particularly the Colne Valley to the west but also including the Crane Valley
- The 3R proposals may also directly undermine planned environmental enhancements - whether through birdstrike controls, through "opportunity banking", or through the CPO blunt instrument undermining existing and effective partnership ways of delivering such enhancements.
- Even if this doesn't occur, there's a risk that HAL may claim future enhancements as compensation for the 3R impacts. Consequently a "rolling baseline" is needed, to distinguish between genuine 3R-derived enhancements and those that would or could have happened anyway
- All of this is greatly compounded by the threat of indirect development at massive scale. Yes, such development will be separately governed by planning processes, but (a) the NPS should put in place controls to protect open spaces etc, and (b) it should prevent HAL from claiming the employment and economic upsides of such indirect development if the environmental and community impacts are to be disregarded at this stage.
- The Crane Valley Partnership (of which both FORCE and HAL are founder members from 2005) has delivered major benefits to the community and environmental value of the Crane valley, particularly over the last 6 years through the Smarter Water Catchment programme – based on catchment based, partnership led and community rooted programme with over 100 projects delivered to date with a value of £25m+. The Partnership is a mechanism for delivering sustainable long term improvements to the catchment. As such it could be an effective partner for mitigation works through any scheme. However, the scheme could also have a major negative impact on the operation of the Partnership if HAL decided to operate independently of it
- The scale of the 3R impacts is such that the BNG target should be higher than the default 10%.

More information on FORCE can be found at www.force.org.uk

More information on the Crane Valley Partnership can be found at www.cranevalley.org.uk

1. Introduction

Friends of the River Crane Environment (FORCE) is a charity, founded in 2003 and with over 700 members. Our Objects are to protect and enhance the community and environmental value of the River Crane catchment. More information about FORCE and the work we do can be found at www.force.org.uk

FORCE has been engaged with Heathrow Airport Ltd (HAL) over many years, both with respect to their day to day operations and (initially since around 2016) the proposals for a new third runway (3R) at the airport as they may affect FORCE's Objects with respect to the River Crane corridor and the other river corridors within the Crane catchment (Upper Duke's, Lower Duke's, Longford and Grand Union Canal). We are also working closely with colleagues in the Colne Valley to the west to assess the overall impact upon the two river catchments.

FORCE has responded to each of the first round of 3R consultations by HAL and the Dept for Transport (between 2016 and 2019) with detailed submissions setting out areas of concern.

This document provides our response to The UK government's public consultation on the draft Heathrow Expansion National Policy Statement 2026 (NPS).

We recognise that specific mitigations for impacts and risks described below may well best be addressed within or under a future Development Consent Order (DCO) for the Third Runway. Our request is that the final Heathrow Expansion National Policy Statement provides a sufficiently prescriptive framework for such a future DCO to give certainty that the impacts and risks will indeed be adequately and appropriately addressed.

2. Context

The Third Runway proposals have the following range of inherent or potential impacts and mitigations:

1. Direct impacts of construction and operation of the third runway
2. Environmental and community impact of Government bird strike requirements and associated bird strike hazard management plans and practices
3. Indirect impacts of secondary development proposals on green infrastructure
4. Green transport proposals
5. Water Framework Directive mitigation schemes
6. Biodiversity net gain target
7. Net community benefit
8. Longer term management and protection of green infrastructure

The outstanding issues around each of these are outlined in turn. Key questions for the Government and HAL are highlighted and numbered HAL1 to HAL20. We recognise that some of these issues are more detailed than would necessarily be addressed explicitly in a NPS. Where this is the case, we would ask that the final NPS contains generic

directions – citing HAL1 to HAL 20 as illustrative examples – that will have the effect of requiring HAL to gather and provide data, consult, provide design details etc, as the case may be in order to satisfactorily address HAL1 to HAL21.

We have also been working alongside colleagues at the Crane Valley CIC www.cranevalleycic.org.uk who are the host organisation for the Crane Valley Partnership. We have set out in the Appendix to this document the key concerns they have set out to HAL in August 2026 regarding the proposals and would ask that you also review and consider these.

3. Direct impacts of construction and operation of the third runway

This is the area which has received most attention from the HAL team through the course of our engagement. 3R is being considered primarily as a major engineering project and the HAL team has been tasked with resolving major engineering issues. Most (but not all) of these issues are focussed on the Colne catchment.

They include:

- The new runway itself and large amounts of associated infrastructure (including three new terminals for example)
- Upstream flood protection measures and downstream drainage measures – which between them will create a large number of new lakes and reservoirs
- A new combined offtake for the Longford and Upper Duke's Rivers with a new combined river channel
- Crossing the Colne valley with the third runway and putting four river channels (including the Upper Duke's and Longford rivers) beneath the new runway
- Temporary works areas
- Noise and air quality issues from additional aircraft over more and wider flight paths as well as additional passenger and employee transport journeys in the local area.

FORCE's key concerns with respect to these issues are:

- To ensure that the offtakes for the Longford and the Upper Duke's Rivers are designed and managed to ensure the appropriate releases into these two river systems. The Longford is primarily a concern for Royal Parks as the water feeds into Bushy Park and Hampton Court. The Upper Duke's is a major concern for FORCE and the Crane as our 'Citizen Crane' project studies (about which we would be happy to provide more information) have shown that the inflow from the Upper Duke's is an essential sweetening flow for the middle and lower reaches of the Crane. **HAL1: we have raised this issue several times with HAL but have not seen any definitive work to address the issue as yet. We would expect HAL to be measuring and analysing river flow data and define the proposed flow regime for the Upper Duke's River along with the means of delivering this flow regime – including the flow controls and management approach. We have seen no evidence to date that flows are being measured or this work is being done.**

- Runway bridging and the impact upon the integrity of the river valley as a wildlife corridor. The primary impact on the permeability of the river corridor would be on the Colne valley and, in combination with the bird strike issue (see below), it could be an existential issue for the integrity of the Colne catchment as a wildlife corridor, effectively severing the linkage along the corridor and between the habitats of the Thames and the Chilterns. The link between the Crane and Colne via the Longford and Upper Duke's is also impacted adversely by this bridging and it is therefore an issue for the Crane as well. This is one issue where there has been considerable design focus to date by the HAL team. **HAL2: we have yet to see a robust design that is shown to provide a permeable migration corridor for all key species**

- Noise and air quality issues will inevitably increase under a 3R future as compared to a 2R future. There will be particularly severe impacts in areas directly under the new 3R flightpaths – such as Cranford [Country?] Park for example – as well as impacts on air quality throughout the surrounding area due to increased road transport. Noise is rightly a massive issue for homes and schools etc but seems to have been largely disregarded with respect to open spaces. This is despite tranquillity in open spaces being increasingly recognised as a precious health resource in urban areas. **HAL3: we asked HAL for specific maps and proposals regarding the assessment of noise and air quality impacts on open spaces; combined with the recognition, mapping and protection of the tranquillity of open space corridors; but have not seen any work on this to date. We would expect noise, tranquillity and air quality assessments to be carried out for all the open spaces and river corridors affected by the airport, whether within or outside the ultimate DCO 'order limits".**

4. Environmental and community impacts of Government bird strike requirements and associated bird strike hazard management plans and practices

Government requirements (see CAA guidance CAP 772) require an airport to control the bird strike risk around the site. In effect this limits the types of environmental enhancement that can be implemented. The full implications of these controls are not yet understood. At present we understand:

- Bird strike is an issue around all airports – but many airports are set within much more bird friendly habitats than Heathrow – City Airport for example or Gatwick. This does not appear to be relevant to CAA however – as their stipulations are that the bird strike risks at the specific airport are not increased
- There are at least 15 key species that CAA are concerned about. These include large water fowl such as Canada geese and swans as well as birds that flock such as gulls and starlings
- Restrictions within the airport boundary include (a) no green roofs or green walls (b) no swales, wetlands or ponds and (c) major restrictions on the environmental value of the extensive 500 hectares of green apron
- However, the effects of bird strike controls are not limited to the envelope of the airport itself and have much wider implications on the natural environment around the

airport. These include – netting of the river systems local to the runways; controls on habitat development (eg wetlands around open water systems, meadows and other habitats); floating deterrents on local water bodies; and the active use of pyrotechnics to scare birds away from sites

- The existing Upper Dukes and Longford rivers around the airport are netted and it is understood that the intention is to net the new river channels both to the north and south of the runway bridging. It is known that birds do get trapped both beneath and within the existing netting. **HAL 4: the width and length of this netted area, and the actual design and implications of the new netting are not yet known. As a result, the full ecological and environmental consequences are currently unknown**

- The proposed netting will also effectively limit the growth of marginal vegetation along the river corridor to below one metre in height – thereby limiting the habitat value of the corridor and reducing any potential for shading within this part of the river corridor.

- The existing impacts of the use of pyrotechnics, habitat controls and other environmental restrictions appear not to have been assessed. Nor have we been told how far around the airport and over how wide an area these restrictions will be extended when a third runway is operational. The potential implications on the existing value of the surrounding environment, could be both major and unexpected, particularly given that the existing impact of such controls seems to be unknown.

- One example is the 5km long and 5 metre high marginal bund proposed along the entire northern perimeter of the airport for 3R (as proposed in 2019). The southern face of this bund could be a major environmental feature for burrowing invertebrates such as solitary bees. However, we were informed by HAL (HAL/FORCE 2019) that this could not be envisaged by HAL due to CAA concerns that these would attract birds and therefore increase bird strike risk. Bird strike risk therefore also controls the habitat development for other species that may be a food source for birds.

- A further example comes from the Southall Gasworks site, which is currently being re-developed as a major housing scheme by Berkeley Homes, with over 8000 properties planned over 25 years. The project manager informed us that HAL had requested Berkeley Homes reduce the scope of their environmental proposals for this site due to bird strike concerns, even for the current 2-Runway operation. This site is 2.5km due north east from the end of the northern runway of Heathrow and also north of the proposed 3R runway.

- The CAA's Guidance on Wildlife Hazard Management at Aerodromes (CAP 772) appears to give great latitude to an airport authority with respect to wildlife management. It defines the term "vicinity with respect to hazard management" as follows:

> *"The term 'in the vicinity' (or aerodrome surroundings) is interpreted to mean land or water within 13 km of the aerodrome reference point and to landfill and waste disposal sites as defined under relevant UK legislation.*

It is important to note that 13km (as a distance to safeguard for wildlife hazard purposes) is not a specific requirement in this context."

A 13 km radius around the airport would include much of the Crane and Colne catchments, as well as large parts of the Brent to the east, the lower Thames to the south and the Chilterns to the north.

- The bird strike issue is a potential showstopper for any environmental enhancement and (given the potency of the safety impact being put forward) in practice it is virtually impossible to argue against on a case by case basis. FORCE is extremely concerned that bird strike will be used as an effective argument to greatly limit the environmental enhancements that can be delivered on a wide scale across the catchment – and that this may only fully come to light following the DCO.
- This type of blanket control on existing and new habitat development would be a major negative impact upon the existing value and future potential of both the Crane and the Colne river corridors, creating an extensive zone across both catchment corridors that restricts the development of new and enhanced habitats and the movement of birds and other species.
- Note that CVCIC has also raised this matter with HAL during recent meetings (CVCIC 2026) – as set out in the Appendix.

HAL 5: HAL are very aware of the bird strike issue but have not yet shared any mapping to show the implications for existing and potential new habitats around the airport. This needs to be provided as a priority. Without this mapping then the true impact of the airport expansion on the surrounding natural habitats cannot be assessed.

HAL 6: HAL has not shared any discussions with CAA and others about the bird strike issue and how this might be applied, managed or mitigated as part of the 3R scheme. In our view a detailed commitment needs to be in place between HAL and CAA which sets out the approach to bird strike and environmental commitments such that all parties understand the full implications of the issue.

In the context of this consultation specifically, we would highlight that birdstrike is an unusual issue, in that HAL will be required to mitigate a safety and operational risk (birdstrike), yet those very mitigations will – potentially for decades - carry significant environmental and biodiversity impacts and risks as described above. Unless the NPS requires the DCO to provide an appropriate framework and sequencing designed to prevent this, we see a real risk that this process will sleepwalk into uncompensated environmental and biodiversity impacts and risks materialising at scale.

Loss of habitat, and the prevention of new habitat creation, is a fundamental issue regarding bird strike. A related issue is the loss of connectivity between habitats and along the river corridors. If wildlife is no longer able to move effectively along the river corridors then this will affect the viability of the corridors as a whole as a wildlife asset. The current permeability of the corridors may well be sub-optimal for wildlife. Our major concern though is the imposition of a major new infrastructure barrier, with associated bird strike controls, that may act as a permanent constraint on both existing wildlife movement and the potential for future improvement.

HAL has collated a considerable amount of data on the distribution of the fauna and flora in the surrounding area and this could help to understand the existing migration routes and the potential for their enhancement – as well as the likely barrier effects of the scheme proposal

HAL 7: FORCE has not yet seen these floral and faunal distribution data nor received any information from HAL about the likely impact upon connectivity of the scheme proposals.

5. Impacts of secondary development proposals on green infrastructure

The direct impact of 3R on the green infrastructure of the surrounding area will be considerable. However, the indirect impacts may be considerably larger. These will include:

- New transport infrastructure – including roads, rail and parking etc
- Support and development infrastructure – including hotels; warehousing; business developments etc
- New housing and other infrastructure

It is inevitable that there will be considerable additional infrastructure provided in one or more regional development zones around Heathrow as a result of 3R, including large parts of the Crane catchment, and considerable development pressures will be brought to bear on the open space networks around the airport.

These pressures have already been illustrated by the Hounslow West of Borough Plan. LB Hounslow policy is for a "better Heathrow not a bigger Heathrow". However, the West of Borough Plan proposes a large tranche of major new developments with a major driver being the prospect of additional demands driven by an expanded airport.

Of particular concern is that these proposals threaten the fundamental and long term protections on open spaces from Green Belt that have operated for many decades. If these protections can be removed in response to HAL development then the whole future of the open space network in the Crane valley is put at considerable risk.

As part of its Environmental Statement HAL should assess the airport proposals in combination with the developments and proposals which will follow in its wake. Only that way can the true cumulative impact of the development be understood.

HAL8: given the increased secondary development pressures and for example: proposals by LB Hounslow to remove large scale open space protections in its local plan, then we would expect HAL, in any proposed DCO, to set out specific and binding long term protections for the open space networks that are proposed for protection and enhancement under the HAL plans. These have not been put forward to date. These protections would provide a binding framework within which secondary developments, and local plans governing them, would need to take place. It is important that the final NPS requires this for any 3R DCO.

In addition, if HAL are not going to accept any responsibility for the secondary development impacts of the scheme then they cannot take credit for the secondary employment and other economic benefits of these developments. In

anticipation of the 3R DCO and associated examination (public inquiry), it is important that the final NPS requires evidence put forward by the 3R proponents to distinguish clearly and transparently between direct (ie, associated with development authorised by the DCO) and indirect (associated with secondary development not authorised by the DCO) benefits and impacts, so that environmental and other impacts and risks can be evaluated fairly against the employment and economic benefits claimed for the 3R proposals.

6. Green Transport Proposals

The proposals for a green transport network linking the airport with the surrounding communities are of considerable importance for HAL in its drive to enhance the modal share of cyclists and pedestrians accessing the airport, and to mitigate deterioration in air quality. At present the access routes for pedestrians and cyclists are at best fractured and challenging and in many cases dangerous. As a consequence the percentages of employees and passengers using these modes of access are very low. This issue assumes even greater significance when the increased numbers of employees and passengers consequent on 3R are taken into consideration.

The green transport proposals also have the potential to enhance the fractured walking and cycling links along the green corridors of the Crane catchment. However, the design and implementation of these links could also negatively impact the environmental value of these green corridors if they are not done with due sensitivity.

At present HAL are proposing a green transport ring around the airport, utilising green corridors including the Crane and Upper Duke's Rivers. There have also been proposals for a wider network of green transport routes that would effectively link the Crane and Upper Duke's corridors into a wider green transport network. In principle FORCE welcomes these proposals. However we are concerned about potential negative impacts of these developments, dependent upon their scale and design.

HAL9: we asked HAL for estimated numbers of users for the routes being proposed during the 2019 scheme – we did not receive these then and have not seen any since.

FORCE has stated that any green transport routes along river corridors, and through other high value environmental sites, have to be designed appropriately and be part of wider plans that enhance the value of these sites. In particular FORCE would be very strongly opposed to any proposals to introduce lighting into the river corridors and other environmental sites, due to the negative impact upon nocturnal animals, bats and invertebrates. **HAL10: FORCE has not seen, for the green transport proposals, any of the design details on which their environmental benefits or disbenefits depend.**

We are keen to see proposals to resolve critical breaks in the access routes along the river corridor. One of these is at the A30 crossing, where we have discussed with HAL the creation of a bridge or equivalent riverside access link that goes over the A30 and the Piccadilly Line, thereby greatly enhancing the link between the lower and middle Crane corridors**. HAL11: FORCE has not seen any details as to how this might be achieved.**

HAL12: there are other key design issues around access – including widening the green corridor along the upper Duke's River corridor; a safe crossing for the A314 at Baber Bridge; stepping back the HAL fence line at Donkey Wood etc – that need to be detailed.

7. Water Framework Directive (WFD) and BNG mitigation schemes

FORCE are supportive of mitigation schemes in principle but have major concerns about how these may be delivered in practice. These concerns are shared by the Crane Valley Community Interest Company (CVCIC, the host of the Crane Valley Partnership) and are set out in the Appendix to this document provided by CVCIC.

In principle FORCE is supportive of enhancing river habitats in the Crane catchment – though we are also very aware that where any such enhancements would be driven by the 3R proposals, they would be being delivered as mitigation for habitat losses being imposed elsewhere by the scheme. We also have a number of issues and concerns regarding the WFD scheme proposals as follows:

- WFD requires the replacement of lost habitat but does not explicitly address the issue of lost connectivity (although this would clearly be within the purpose and spirit of the WFD provisions)– as noted in section 4 above, this is a key concern for FORCE.
- FORCE, along with partners, have our own plans for enhancing the areas proposed for WFD schemes. It will be essential that WFD schemes work alongside existing scheme proposals and do not seek to duplicate them. A worst case outcome would be for planned enhancements in these areas to be stalled and/or made subject to HAL funding. Any enhancements should be genuinely additional to those already planned.
- The WFD schemes need to be integrated into the wider network of communities and associated organisations during their detailed design and implementation. A scheme that is imposed upon the local area and communities will not be sustainable. There is considerable potential for HAL to work with the community to deliver these environmental improvements.
- The WFD schemes need to be managed for the long term to ensure the benefits are sustainable. This issue is considered further in section 10 below.

HAL 14: we have yet to see how HAL's schemes will address these issues. Conceptually, the presence in the Crane catchment of a successful ongoing partnership approach to delivering projects of environmental and community benefit can be thought of as creating a "rolling baseline" against which 3R-related environmental and community benefits (whether as mitigation or compensation for 3R impacts) must be judged to be truly additive, and which any 3R-related programmes and initiatives must not cut across, or undermine (for example by

"opportunity banking" – see Appendix below). It is for HAL as proponents of the 3R to spell out in its proposed DCO how this will be measured, managed and achieved: our request is that the NPS provides explicit direction to that effect.

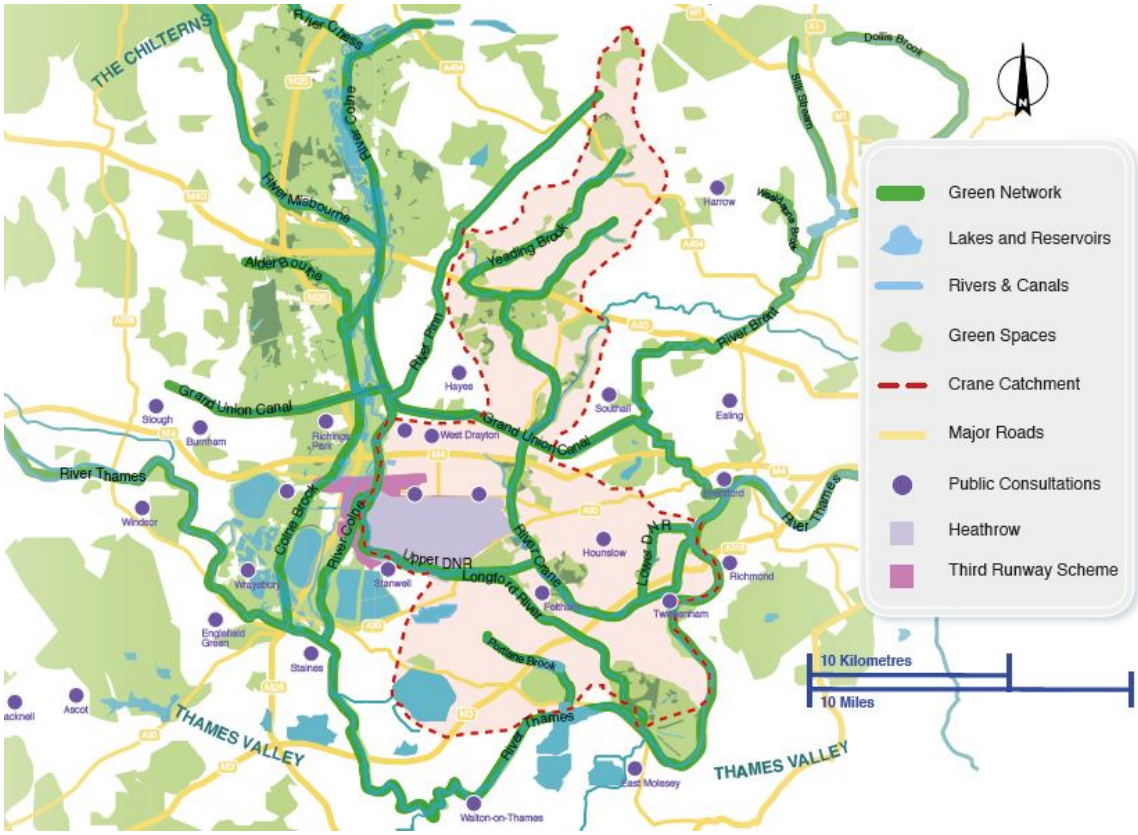
8. Biodiversity Net Gain

The National Planning Policy Framework requires development decisions to contribute to and enhance the local environment, including through providing net gains for biodiversity. The NPPF notes that this includes through the establishment of coherent ecological networks that are more resilient to current and future pressures. From our perspective this is the major test (alongside community impact and benefit below) for the sustainability of the scheme. The testing of the environmental impacts and benefits should be with respect to a 2R baseline, which itself would vary over time. Any benefits accruing from technological enhancements – such as to air quality and noise parameters – should be factored into the 2R baseline, against which the impacts of the proposals are assessed. It has not been stated what baseline is being assumed in the evaluations against this target. **HAL15: how will the 2R comparative baseline be evaluated?**

There are clearly major environmental impacts of the scheme including:

- New infrastructure overprinting open spaces
- Air quality and noise – from aircraft movements, increased land transport movements and associated activities
- Loss of connectivity – both from the infrastructure and associated bird strike controls
- Carbon and climate change impacts

These impacts are on a sub-regional basis and extend over the consultation area of the scheme – as per Figure 1 below. This area extends over a radius of approximately 15km around the airport and includes most of the Crane and Colne catchments (as well as the parts of the Brent and lower Thames) in an area of around 700 sq km.



There are enormous (and potentially existential) negative impacts of the scheme – both locally for the Colne catchment and regionally given bird strike, secondary development impacts and connectivity impacts. In our view, (a) the bird strike issue needs to be resolved in favour of ongoing environmental enhancements and (b) positive interventions have to be applied at the same wider and sub-regional level for there to be any reasonable chance of achieving net environmental benefits as per NPPF.

FORCE has been pressing this need for a sub-regional and landscape scale approach to the issues around Heathrow over several years. This has received some support within HAL, but for the most part the proposals for environmental enhancements remain at a local scale around the airport. We consider this to be grossly insufficient to achieve net benefit.

In 2019 FORCE worked with the Heathrow Spatial Planning Group (HSPG) – including the Colne and Crane Valley Partnerships – to support the production of the Colne and Crane Valleys Green Infrastructure Strategy (launched in November 2019). This strategy sets out a long term management and enhancement approach for these catchments to protect and enhance their value as environmental and community assets linking London and the River Thames corridor with the Chiltern hills – by greatly enhancing the connectivity, community and environmental value of the connecting Colne and Crane river corridors.

The strategy sets out a detailed list of enhancement measures to be delivered over the medium to long term to achieve a transformative effect on the community and environmental value of these river corridors.

There have been a considerable number of improvements delivered across both the Colne and the Crane Valleys over the last seven years following the production of this CCVGIS. This document therefore needs to be updated as a priority – as set out in the Appendix.

At present we have seen various schemes outlined for environmental benefits local to the airport. However, we have not seen any amalgamation of these schemes, or any metrics for how the benefits of these schemes may be considered against the impacts of the scheme.

Additionally, we note that the applicable BNG target for airports is the default 10% net gain. Given the scale of the 3R project and undoubted materiality of its potential biodiversity-related risks and impacts (including as described in this document), we would ask the Government to specify a higher – 20% or 15% - BNG target for the 3R.

HAL 16: How does HAL propose to meet the requirements of the NPPF with regard to net environmental benefit?

9. Net Community Benefit

Our charitable Objects require us to measure any development in respect of its environmental AND community risks and benefits on the Crane valley. Whilst there has been discussion of environmental risks and benefits there has been no comparable discussion or review of the positive and negative impacts of the scheme upon the community value of the open spaces of the Crane valley. Community values include the use and appreciation of the open spaces by local communities for recreation, health, education and green travel purposes for example.

HAL 17: How is HAL evaluating, measuring and planning to consult on the impacts and benefits of the scheme upon the community value of the open space network?

10. Longer Term Protection and Management of Green Infrastructure

If HAL is able to deliver net environmental benefits for the area surrounding the airport, including green infrastructure, then these benefits will need to be protected and managed for the long term.

The green infrastructure in the vicinity of Heathrow would be particularly vulnerable to development pressures following a 3R development. The green infrastructure protections afforded by Green Belt and Metropolitan Open Land designations have never seemed more vulnerable to challenge and removal, and several local authorities in the vicinity of the airport are already in the process of reviewing their Green Belt protections.

HAL 18: How will HAL ensure that any benefits delivered for green infrastructure will be protected for the long term? In our view this will require an enhanced system of legal protections that HAL and all other land owners commit to for the long term benefit of local communities and the environment. We ask that the final NPS provides the requisite statutory framework for this system to be put in place.

Maintenance is a major challenge with all green infrastructure. In our experience, maintenance is best delivered by the provision of background maintenance activities plus ongoing small scale and cumulative enhancements, delivered by land owners working in partnership with local communities and other interested parties.

11. Smarter Water Catchment programme and the Partnership led Approach

In 2020 the Crane Valley was identified as the first urban Smarter Water Catchment. As a result large scale funding has been received (around £5m from Thames Water and over £20m to date from third party sources) to develop the UK's first catchment based, partnership led and community rooted management approach for urban river systems. We believe this has been a great success and has helped to deliver transformational change to the community and environmental value of the Crane Valley – with funding in place until 2030. More information on this is provided in the State of the Crane Environment Report and the Catchment Plan

https://www.cranevalley.org.uk/wp-content/uploads/2025/02/State-of-the-Crane-Environment-Report-February-2025.pdf

https://www.cranevalley.org.uk/wp-content/uploads/2025/08/River-Crane-Catchment-Plan-2025-2030-First-Edition.pdf

The delivery mechanisms developed through this programme are fundamental to its success – broad partnerships of landowners, technical specialists and community groups that are ensuring effective scheme delivery, based on nature based solutions, combined with ongoing monitoring and maintenance with the lessons learned for the next scheme and the communities fully engaged.

The programme is being delivered by the Crane Valley Partnership – set up in 2005 and including all five Crane valley boroughs, Thames Water, the Environment Agency and HAL – as well as over 80 community based groups including FORCE. Note that both FORCE and HAL were founder members of the Partnership – although HAL has not been actively engaged over the last few years.

It is essential in our view that the approaches developed by HAL for delivery around the 3R scheme are aligned to the Partnership led approach and are not allowed to cut

across it for reasons of short term perceived expediency or control. There is both a major opportunity and risk here for any scheme that moves forwards as well as the catchment as a whole.

A further risk is that HAL identifies opportunities for mitigation that are then effectively banked by the scheme. This would restrict the delivery of the schemes by the Partnership in the interim period and potentially mean that any delivery is not in line with the approaches currently being effectively delivered by the Partnership.

In our view the green space networks can only operate sustainably if they engage the local communities and populations (totalling 650,000 people in the case of the Crane) plus all other interested public and private sector parties, in their enjoyment, maintenance and ongoing improvement. In our view there is an opportunity for HAL, in conjunction with other interested parties and under the umbrella of the Crane Valley Partnership, to help deliver this high value network for the benefit of wildlife and local communities, over the next thirty to fifty years and as part of this existing successful Partnership.

As well as wildlife and biodiversity benefits this would provide community benefits – from the educational, green transport, health, climate change and socio-economic benefits of open space use. HAL would be a key party to these deliverables in partnership with other public and private sector agencies and wider community bodies.

The benefits in the Crane catchment would link to wider networks of green infrastructure and other sub-regional organisations in the Colne, Brent and lower Thames catchments.

HAL 19: how does HAL envisage the green infrastructure networks will be managed and funded in the long term. How will HAL support these networks and ensure they continue to provide benefits and improvements during the long term operation of HAL?

HAL 20: How will HAL engage with the existing well developed partnership approach to project delivery through the Crane Valley Partnership? Can delivery requirements for green and blue infrastructure etc be integrated into the ongoing Partnership work through the Smarter Water Catchment programme? Can this approach ensure that opportunity banking does not occur through any scheme?

HAL 21: the immediate deliverables and longer term management and maintenance of green infrastructure assets will require legal agreements with land owners, regulators and other key interested parties. How does HAL envisage this will be done and over what timescale?

APPENDIX

FORCE is in regular contact with the Crane Valley CIC as the host organisation for the Crane Valley Partnership.

CVCIC has set out six key issues which need to be resolved at an early stage of the scheme process – and which are still outstanding as below.

1. ***Colne and Crane Valleys Green Infrastructure Strategy***

Issue*: this document was published in 2019 with CVP support as part of the Heathrow Spatial Planning Group's (HSPG) response to the initial HAL 3R proposals. It provided a valuable baseline condition for that time along with opportunities for improvements to access and environmental value. We have delivered a huge amount of environmental and access improvement works in both the Crane and Colne catchments over the last seven years and our thinking has also evolved considerably. We (and the Colne Valley team) have asked for this document to be updated as a priority. At present we have not had a positive response to this from either HAL or HSPG. We understand that HAL may currently be using the 2019 report as a baseline for their work – which is clearly now well out of date and would cause major issues if continued with.*

2. ***Opportunity Banking***

Issue*: CVP are making rapid progress with improvements to the community and environmental value of the Crane Valley – with £million+ of new investments announced in recent months alone. HAL are looking to deliver improvements as mitigation for the major impacts of their scheme – and are looking to do this locally where possible. We are supportive of local mitigation in principle. However, we are very concerned that, in practice, scheme opportunities banked by HAL to deliver as part of their project may then be unavailable for improvement during a potentially extended interim period - and may be lost if HAL are unable to achieve planning approval. As a result, what might at first review be considered as a benefit may actually be another impact as a lost (or at least deferred) opportunity.*

3. The DCO and implications for Compulsory Purchase Orders (CPO) and the integrity of the Crane Valley

Issue: *Based on discussion of the DCO area at the meeting on 27/8/26, the Order limits area – within which CPO is a possible means of delivering mitigation scheme - appears to include the Crane Valley between Staines Road and the M4 – a 5000m length of the central Crane Valley river corridor and including around 100 hectares of linked public open space. There also appears to be potential for a series of other locations along other parts of the Crane Valley – including a large part of the lower Crane corridor through Richmond and Hounslow – to be included within the Order limits, thus introducing the same potential use of CPO powers for those areas.*

At present we see this as a major potential threat to the integrity of the Crane Valley – equivalent to some degree to the impact of the 3rd runway proposal on the Colne Valley. The possibility that control of large parts of the Crane Valley may be transferred from public open space to a private company by CPO is very disturbing to us.

4. 3R Mitigation Scheme Delivery

***Issue**: CVP have been refining our partnership-based approach to the delivery of major improvement schemes for rivers and open spaces over the last ten years or so. This approach integrates the needs of people and the environment, working alongside the landowners and local communities to ensure that the schemes are designed, implemented and maintained to optimise their environmental and community benefits for the long term.*

We believe that our approach is both effective and cost efficient when compared to other (and more traditional) large scale schemes in urban open spaces – many of which are beset by community concerns, opportunities missed and cost over-runs. We are concerned to ensure that any schemes delivered as part of the 3R mitigation works adopt and develop upon this proven approach and do not cut across it.

5. *Bird Strike and Site Sterilisation*

***Issue:** HAL has not addressed the potential effect of bird strike controls – set by themselves and/or the CAA – as a landscape based impact on the opportunities for further enhancing the biodiversity value of the Crane Valley. We raised this issue with HAL and Natural England in 2019 when the 3rd runway was last being assessed and we have raised it again this time. We understand from our recent HAL Biodiversity meeting that HAL have yet to meet with CAA to discuss this issue.*

Our concern is that HAL and/or CAA will at some later date raise concerns about enhanced bird strike risk (or a 3R bird strike risk management plan or similar will require measures to be taken) which will lead to compromising (and potentially sterilising) significant parts of the catchment from improvements to flood risk, biodiversity and community value.

6. Approach to Biodiversity Net Gain (BNG)

***Issue**: if the 3R scheme is granted permission then there will be a major requirement for BNG schemes to mitigate impacts and provide net benefits. We anticipate there will be a desire from all local parties to see a large part of the BNG delivered locally to the airport – for basic reasons of fairness and legitimacy if nothing else – subject to our concerns regarding CPO (as set out above) being met. BNG has been around for a while in principle but there have been few if any schemes delivered in Greater London to date – for all sorts of reasons. How are HAL and their team going to work with the process and local landowners and other stakeholders to resolve the current issues with BNG and maximise the biodiversity benefits that are delivered locally?*