

08 October 2025

Introduction

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1. My name is Jolyon Brewis BA(Hons) BArch RIBA FRSA. I am a Partner with Grimshaw, an architectural, urban design and masterplanning consultancy.
2. Along with other professionals I have helped to develop Heathrow's expansion proposals since 2017, and am currently engaged in the ongoing development of these proposals.

Heathrow's objection to the appeal proposals

3. I am aware of the letter of objection to the appeal proposals submitted by Emily Fitzpatrick of Heathrow Airport on 15th July 2025 ("the Objection Letter"). The Objection Letter outlined three grounds of objection. The first ground was "*The siting of proposals at Manor Farm which conflicts with plans for a third runway at Heathrow Airport to accommodate re-provision of displaced land uses*". Following the direction from the Inspector on 6th October 2025 I will be attending the public inquiry to speak to this first ground of objection. Heathrow's other objections should continue to be considered by the Inspector as written representations.
4. Although I was not the author of the Objection Letter, I confirm that I support the first ground of objection. The appeal site is an important site that is required as part of Heathrow's expansion proposals.

The 2019 Scheme Development Report

5. I note that the Appellant has put into evidence Chapter 7 of the Scheme Development Report for Heathrow Expansion (I believe this document is being allocated the core document number 14.8). The document formed part of the consultation conducted by Heathrow for its Expansion Project in June 2019.
6. It is important to understand the nature and purpose of this document. To that end I draw attention to the following paragraphs, Tables and figures within it:
 - A) The Methodology section, in particular paragraphs 7.3.1-7.3.3. These should also be read with paragraph 7.3.12 which states: "*... no decisions were taken on which potential sites were appropriate for which land use*"

- B) Figure 1 gives the long list of sites. The appeal site is comprised of parts of site G5
- C) Table 7.9 (on page 7.21) gives a list of “distribution principles” against which the different uses for airport-related development were assessed. “Cargo & Freight Forwarding” has as its distribution principles the desired characteristic of being within 1 mile of the cargo entrance to the airport, and the second distribution principle makes clear that *“... it is highway access –rather than geographical location per se – that is the key determinant”*
- D) All the sites considered were either ruled out (“not considered suitable”) or ruled in (“may be suitable”) for further consideration. Site G5 was an example of the latter. At this short-listing stage no sites were accorded any higher classification than “may be suitable”
- E) Paragraph 7.4.32 describes what further analysis was then due to take place
- F) Paragraph 7.4.39 confirms that the short-listed sites were evaluated based on *“operational importance and any appropriate policies”*
- G) Appendix C (Figure 7.29) shows the allocation of preferred sites for Freight Forwarding. Site G5 is included in this list. The purple edging on Figure 7.29 identifies the three selected locations for new and displaced freight forwarding facilities
- H) The preferred masterplan layouts at Figures 7.25 and 7.26 both show the G5 site, shown coloured dark grey (Figure 7.25) and brown (Figure 7.26) respectively
- I) Paragraph 7.5 then explains what was due to happen following the 2019 consultation

Draft Project Development Masterplan Report – April 2020

- 7. Heathrow’s refinement of masterplan options did not end with the 2019 consultation document. The Expansion Project was suspended in April 2020 owing to the impact of the COVID-19 pandemic, but by that stage further work had been done.
- 8. In April 2020 an internal document – the “Project Development Masterplan Report” – had been produced. I **append** an extract from this document comprising the index and Chapter 12 dealing with Airport Related Development.
- 9. Chapter 12 of the document describes the outcome of the 2019 consultation, the further refinements to the masterplan made since then. It ended with the production of a stage “M5” masterplan in February 2020, which is found at Figure 12-3 on page 167 of the extract. This masterplan indicates that the eastern part of site G5 is required for cargo-driven Airport Related Development (freight

forwarding) and electrical infrastructure (new National Grid supply point) and the western part is required for enhanced open space and 'active travel'.

Summary of Land Use Strategy Principles – September 2019

10. I have also retrieved, and **append**, a working draft document prepared by Quod for Heathrow's Expansion Programme entitled "Summary of Land Use Strategy Principles" in September 2019. This was prepared primarily to assess the impact of the masterplan scheme on green belt designations.
11. The main author of the document was Sean Bashforth of Quod (the "SB" comments), with comments also from Philip Murphy of Quod (the "PM" comments). (Please note that the yellow highlighting is from the source document).
12. I draw attention to the section headed "Freight Forwarding" on pages 7 and 8. This shows that the rationale for, and importance of, the sites allocated in the masterplan for freight forwarding had remained unchanged since the June 2019 consultation document.

Appellant's Rebuttal evidence

13. Finally I note the Appellant's Rebuttal evidence to the evidence of Paul Stimpson and Daniel Ray for the Council, specifically the parts of section 8 of the Rebuttal, 'Heathrow Airport', that relate to the status of Heathrow's proposals.
14. I make the following comments on that rebuttal proof, by reference to the paragraph numbers:
 - A) In paragraph 8.4(b) it is asserted that Heathrow's proposals represent a 'Preferred Masterplan' which will be subject to further design development, testing and engagement prior to its finalisation and submission as part of the DCO application. Whilst this is true, it remains the case as at today's date that Heathrow still intends to include the Manor Farm site as part of its proposals for freight forwarding and electrical infrastructure to support the operation of the airport. This is because of the demonstrable requirement for these facilities, the careful process that was followed to select the site in the first place (as described above), and the appropriateness of the site for the proposed use supported by the engagement and consultation undertaken to date.
 - B) In paragraph 8.4(d) it is asserted that the DCO application needs to decide what proportion of the forecast requirements are accommodated in the DCO as opposed to being left to the Local Plan process and the normal functioning of the property market. It should be noted that the total amount of freight forwarding use included in Heathrow's proposals represents only part of the overall forecast demand; consultation responses indicated that local boroughs would prefer more freight forwarding to be included in DCO. For these

reasons Heathrow considers that it would be inappropriate to reduce the amount of freight forwarding land use in its DCO application. The land to the west of Poyle Trading Estate (including the Manor Farm site) comprises over 40% of the freight forwarding land contained in Heathrow's proposals and, as such, it would be a major detriment to Heathrow's proposals if this land were not able to accommodate the freight forwarding facilities that have long been planned for it.

- C) At paragraph 8.20 it is asserted that alternative sites exist to accommodate freight forwarding activity. As described above, Heathrow undertook a methodical process to select sites for proposed Associated Development, including freight forwarding. This process included the identification of a broad range of candidate development sites and a staged approach to the evaluation of suitability of each of these sites for airport-related uses. Many of these sites were judged to be unsuitable or less preferred for freight forwarding use. The land west of Poyle Trading Estate (including the Manor Farm site) was identified as being particularly appropriate for freight forwarding due to its relative proximity to Heathrow's cargo facilities, its excellent access to the strategic highway network, the efficiency in operations arising from the amount of floorspace that can be provided on that site, and the efficiency in operations arising from the adjacency to similar existing airport-related activities within Poyle Trading Estate. Heathrow considers that the appeal site is by far the best site for delivering the scale of development required. Were the site to be taken for a different use it would significantly impact Heathrow's ability to deliver the necessary freight forwarding uses in a comprehensive and sustainable way.

The evidence which I have prepared and provide for this appeal reference APP/J0350/W/25/3366043 in this statement is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.



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