



## **Further submission to the new London Plan EiP by the Heathrow Strategic Planning Group (2478)**

***Matter 14. Are the Opportunity Areas identified on the Key Diagram and Figures 2.4 to 2.12 likely to deliver the indicative number of additional homes and jobs assumed in the Plan in a way that is justified and consistent with national policy?***

### **About the HSPG and further context**

1. The role and objectives of the Heathrow Strategic Planning Group (HSPG) are set out in our original submission, however it is necessary to update membership and other details.
2. The membership of the Group<sup>1</sup> has now increased to include Elmbridge Borough Council and the Royal Borough of Windsor and Maidenhead as full members of the Group.
3. It is correct to consider the HSPG as a 'Local Authority or other agency' rather than a 'campaign group' and we are grateful to the EiP Secretary for recently reclassifying HSPG in this way on the EiP website. HSPG members comprise the local authorities,

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<sup>1</sup> **Full Members** of the HSPG are: Buckinghamshire County Council, Colne Valley Park Community Interest Company (responsible for the Colne Valley Regional Park), Enterprise M3 Local Enterprise Partnership, London Borough of Ealing, Elmbridge Borough Council, London Borough of Hounslow, Royal Borough of Windsor and Maidenhead, Runnymede Borough Council, Slough Borough Council, South Bucks District Council, Spelthorne Borough Council, Surrey County Council, Thames Valley Berkshire Local Enterprise Partnership, and Buckinghamshire Thames Valley Local Enterprise Partnership. (Slough act as 'host' / accountable body for the small Core Team of staff who service the Group.)

Other organisations have '**Observer**' status and participate in many of the activities of the HSPG, including: Department for Transport (Aviation Team and others), Environment Agency, Heathrow Community Engagement Board, Highways England, Natural England, Public Health England and West London Alliance (of London Boroughs)

local enterprise partnerships and one third sector organization, covering the core functional economic area<sup>2</sup> surrounding Heathrow Airport – both within and beyond the Greater London boundary. The work involves officer level and political level joint working with strategic decision making by a regular political Leaders Meeting.

4. The Group does not adopt a position on whether or not a third runway should be built at Heathrow, but we believe joint working will result in more effective spatial planning and management of impacts and help maximise the benefits of and compensation from any expansion of the airport to the local economy, communities and the environment.

5. The Group work with Heathrow Airport Limited and the Heathrow Community Engagement Board (established following the Airports National Policy Statement (Airports NPS)) but Heathrow Airport Limited are not a member of the Group. The Group is constructively engaging with Heathrow Airport Ltd in work that considers scenarios for both a two-runway and three-runway future.

6. In July 2018 Parliament approved the Airports NPS with a considerable majority, seeking the opening of a third runway in 2026. It is anticipated that a Development Consent Order will be submitted in mid-2020, associated planning applications for enabling work are likely to be submitted before that, and further legal challenges are most likely.

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<sup>2</sup> The LB Hillingdon have **declined** to join the Group and the Mayor of London (GLA and TfL) has **withdrawn** from 'observer' status.

***M14. Are the Opportunity Areas identified on the Key Diagram and Figures 2.4 to 2.12 likely to deliver the indicative number of additional homes and jobs assumed in the Plan in a way that is justified and consistent with national policy?***

***M14. a) Are sites likely to be available in the Opportunity Areas with sufficient capacity to accommodate the expected scale of development?***

7. The estimates of capacity and demand are based on GLA sources that do not take account of more than ‘baseline’ trend growth related to Heathrow airport. It is likely that these will need to be revised in the near future. The HSPG is investigating and planning for these matters over an area that includes the Heathrow/ Elizabeth Line West Opportunity Area as indicated in the new London Plan.

8. HSPG and Heathrow have been working together to develop an evidence base that aims to:

- Provide a comprehensive review of all planned infrastructure across the HSPG area, plus that proposed by airport expansion (scheme as detailed in Jan 2018)
- review and agree evidence around the various forecasts for airport related growth in employment, floorspace and housing that will need to be planned for in addition to ‘baseline’ planned growth (including that in the new London Plan). This includes a form of economic analysis previously employed in joint authority commissioned studies of the impact of airport expansion to identify: Direct on-airport employment growth, Direct off-airport growth, local Induced growth and Catalytic growth, both locally and more widely.

9. The evidence will be reviewed and updated in the first half of 2019, and we intend to provide more detailed information on this in our Hearing Statement on Matter 87 (Aviation).

10. The work identifies opportunities for development across the wider HSPG area which includes the Heathrow/Elizabeth Line Opportunity Area. The growth will support development at Old Oak / Park Royal and beyond. The GLA and LB Hillingdon have been invited to participate in this work but have so far declined.

11. A new Western Rail Access to the airport is likely to be subject to a DCO application next summer and several proposals for further evaluation for a new Southern Rail Access are to be announced at the end of this year. The HSPG's agreed position is that both lines together with transformative changes to the bus network around the airport are required now, regardless of whether a third runway is built, and that this infrastructure investment can unlock growth for further sustainable growth and regeneration.

11. The HSPG is now preparing a Joint Strategic Planning Framework to address this growth in demand and capacity, including new capacity that may be unlocked through major new infrastructure, including Western Rail Access (referred to as SIP11) and a form of Southern Rail Access (SIP 10) and transformative bus network changes made possible through airport expansion. The intention is to adopt initial parts of the Joint Spatial Planning Framework before the Airport expansion DCO is submitted in mid-2020, so that becomes part of the policy framework against which the DCO is examined.

## **12. HSPG seek:**

**Amendment to the text and figures (paras 2.1.62-64) Heathrow/Elizabeth Line West opportunity area to make specific reference to the importance and potential of Southern Rail Access and Western Rail Access to Heathrow<sup>3</sup>, and**

**Commitment now from the GLA and TfL to engage constructively with HSPG to progress these studies to jointly plan for the potential impact of airport expansion**

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<sup>3</sup> The Colne Valley Park CIC does not support Western Rail Access or some of the proposed routes of Southern Rail Access

**scenarios for growth and infrastructure. Only in this way can it be established *if sites are likely to be available in the Opportunity Area with sufficient capacity to accommodate the expected scale of development?***

**Paragraph 2.1.63 should be revised to reflect this new activity and intent.**

***M14. g) Would Policy SD1 provide an effective strategic context for the preparation of local plans and neighbourhood plans?***

13. We draw particular attention to a number of clauses of Policy SD1:

- Clause A 1) (a) to (d) commit the Mayor to:
  - (a) “providing support for collaborative preparation and implementation of planning frameworks”,
  - (b) “assisting in the delivery of infrastructure requirements to unlock capacity”,
  - (c) “support regeneration”, and
  - (d) work in an “open and timely manner”.
- A 2) seeks the bringing together a range of intervention and investment – this can build on the joint evidence base work that looks across all aspects of infrastructure
- A 3) – the clear aim of the HSPG is to achieve lasting legacy benefits and shift policy directions and investment to support change and regeneration across the sub-region, this is entirely consistent with the stated Policy
- A 4) commits the engagement of TfL and others to champion the work.
- A 5) and 6) seek inclusion and quality,
- A 7) addresses ongoing work to overcome barriers to implantation and monitoring, again collaborative working with the HSPG authorities will provide a basis for this, and

- A 8) seeks “ambitious mode share targets”, this is essential to address air quality standards and combat congestion and inequality of access to new jobs.

**14. The engagement of the Mayor of London ‘family’ with the HSPG authorities (inside and beyond Greater London) in the collaborative work to plan for the Opportunity Area would be fully consistent with the stated intent of the Policy SD1. The Policy, if followed, can provide an effective basis of working; there is no need to wait for the Policy to be adopted before the GLA/TfL join this important work starts.**