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New London Plan
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2 March 2018

Dear Mayor of London

Draft New London Plan

This representation is made by the Heathrow Strategic Planning Group.

About the HSPG

The Group (HSPG) was established in late 2015 and currently has 12 full members comprising¹ local authorities, local enterprise partnerships and a third sector organization, covering the core functional economic area surrounding Heathrow Airport – both within and beyond Greater London. The Group does not adopt a position on whether or not a third runway should be constructed at Heathrow and individual members hold a range of views – a decision on this national infrastructure will be made by Parliament in adopting the Airports National Policy Statement. The Group is constructively engaged with Heathrow Airport Ltd (HAL) to grasp the ‘once in a lifetime’ opportunity for collaborative planning to deliver the improvement of the UK’s principle gateway area. Joint working will result in more effective spatial planning and

¹ **Full Members** of the HSPG are: Buckinghamshire County Council, Colne Valley Park CIC, Enterprise M3 Local Enterprise Partnership, London Borough of Ealing, London Borough of Hounslow, 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 some of the activities of the HSPG, including: Greater London Authority, Government (representatives from DCLG/BEIS, and DfT Aviation Policy), Highways England, West London Alliance, Royal Borough of Windsor and Maidenhead and Elmbridge Borough Council. The LB Hillingdon have **declined** to join the Group.

management of impacts and help maximise the benefits of and compensation from an expanded airport to the local economy, communities and the environment; it gives the Members more 'clout' in negotiating with Government and HAL. The Group have recently made joint representations to DfT Aviation Strategy, Airports NPS and the Parliamentary Transport Select Committee.

The Group has just been awarded a Planning Delivery Fund grant to support joint planning work, commission of specialist consultant joint evidence studies to support additional work to be undertaken by the members to ensure the HSPG has the capacity to work proactively and independently of HAL.

Subject to HSPG governance, the intension is to develop a Joint Spatial Planning Framework (JSPF) addressing the growth in housing and employment need across the area (including the provisions of the new London Plan) in addition to meeting the demands of Heathrow expansion. Evidence shows that whether or not the Air Traffic Movements (ATM) 'cap' be raised or a third runway built, there will inevitably be expansion in both passengers and air freight related logistics to be planned for.

Work has commenced with a series of Joint Evidence Base and Infrastructure Studies (JEBIS) – funded as pre-application DCO work by HAL but led and produced to specification jointly agreed by HSPG and HAL. The process is designed to encourage observers and other stakeholders to also engage. Where the Group feel that additional work is required the PDF grant will be drawn upon to ensure all dimensions of sustainable development considerations are properly addressed. The PDF budget must be expended by end of March 2019.

Government decision on the Airports National Policy Statement (NPS) is expected in early summer. If designated, HAL are expected to submit a Development Consent application in winter 2019/20.

Response to the draft London Plan

Many of the members will be making their own representations to the draft new London Plan, this joint representation focuses on matters directly relevant to the Group's objectives and matters of general agreement. This is outlined in adopted Outcome Statements – **attached for information**.

In general terms the new London Plan policies in relation to the airport and local area are supported, whilst some relatively minor points of wording are suggested for improvement. The principle interests of the Group are:

- Policy SD1 Opportunity Areas and definition of the Heathrow/Elizabeth Line West and Strategic Infrastructure Priority projects (Fig 2.15)
- SD2 Collaboration with the Wider South East and SD3 Growth locations in the Wider South East and beyond, and the change from the 'Western wedge' to the 'Heathrow/Elizabeth Line and West' concepts.
- Policies E1 and E4 for office and logistics
- Policy SI1 Improving Air Quality
- Policy T3 and Table 10.1 Indicative list of Transport Schemes
- Policy T8 Aviation

Overall, the Group is concerned that the evidence base for the new London Plan has not adequately addressed the additional impact for growth in the area on the demand for housing, employment, environment and infrastructure necessary to respond to Heathrow Airport expansion scenarios (2-runway or 3-runway growth).

The Group request that GLA and TfL constructively engage with the HSPG with joint planning work to address this as a matter of urgency – the work is fully consistent with delivery of emerging Policies T8, SD1, SD2 and SD3. The options and scenarios to be considered are becoming clearer, with Government decision on the Airports NPS in the early summer and HAL’s progression of pre-application DCO design optioneering developing onward from the Stage One public consultation currently underway.

Policy SD1 Heathrow/Elizabeth Line West

The indicative definition of the Heathrow Opportunity Area within the ‘Elizabeth Line West’ area is noted, together with outline statistics indicating the Heathrow OA has capacity for 13,000 homes, 11,000 jobs over an unstated area; this compares to the previous Heathrow OA (first specified in the London Plan 2004) for an area of 700ha, 9000 homes and 12,000 jobs growth. The basis of these new figures is not known. Para 2.1.63 notes that the area’s potential will be reviewed when expansion proposals are clearer.

There appears to be a minor error in that the text reference to Figure 2.15 Strategic Infrastructure Priority projects only refers to project 11 (London-Reading / Western Rail Access to Heathrow) whereas this text, for the Plan to be internally consistent, should also refer to project 10 (London-Surrey / Southern Rail Access to Heathrow)

We seek (a) that the omission is corrected so that reference is made at para 2.1.63 to both SIP 10 Southern Rail Access to Heathrow and SIP 11 Western Rail Access to Heathrow², and (b) that GLA and TfL now engage constructively with HSPG to progress studies to review the potential impact of airport expansion scenarios for growth and infrastructure.

Policies SD2 and SD3 and change in definition of the ‘Western Wedge’ to the ‘Heathrow/Elizabeth Line and West’

The previous Plan included a Key Diagram that ‘looked’ beyond the GLA area boundary into the Wider South East (WSE) including the definition of a ‘Western Wedge’ extending along the M40/M4/M3 corridor; the new draft Plan focuses on a defined ‘Heathrow / Elizabeth Line West’ area within the GLA boundary with commitments under Policy SD3 to work with WSE partners.

The Group is expressly committed to collaborative working across the GLA boundary and throughout the functional economic area of Heathrow; whilst the Group does not have a ‘position’ on the merits of this proposed change, it is recognised that this ‘fits’ with the rest of the draft plan strategy and important new rail infrastructure about to come on stream. However, the Group notes that the concept of the ‘Western Wedge’ is well understood and offers a useful description of the

² The Colne Valley Park CIC does not support Western Rail Access or some of the proposed routes of Southern Rail Access

geography of the functional area for which the airport is as a very significant economic driver with strong direct, indirect and kinetic effects.

The methodology for the JEBIS work now being undertaken by the Group with HAL has now been identified to include a study area defined as:

“The ‘Heathrow/Elizabeth Line’ area plus Thames Valley Berkshire, Buckinghamshire Thames Valley and M3 (covering all three LEPs)”. It is therefore clear that Group intend to work consistently with the new London Plan approach drafted at Policies SD2 and SD3.

We seek the constructive engagement of the GLA and TfL in this joint work, and inclusion of reference to this in the new London Plan as an important example of collaborative working in the WSE and context to the Heathrow/Elizabeth Line West area.

It should be noted that the Group is working closely with joint planning work led by the West London Alliance boroughs funded by a further PDF bid.

Policies E1 and E4 for office and logistics

It is noted that Policy E1 identifies out of centre office locations to include Chiswick Park, Bedfont Lakes, Stockley Park, where steps are to be taken to achieve greater levels of access by public transport; this is welcomed. The assessment of adequate capacity for office growth has not factored in a range of scenarios reflecting for airport expansion as yet.

Hillingdon, Hounslow and Ealing boroughs are all identified to retain or provide capacity for industrial land. Policy E4 addresses demand for space for Industry, logistics and services to support London’s economic function – the Group is concerned that inadequate consideration has been given to the rapid expansion of ‘belly hold’ cargo and dedicated air freight through Heathrow. Evidence prepared for HAL provides low to high range forecasts for three scenarios: (i) 2-runway constrained, and 3-runway growth (ii) ‘carbon capped’ and (iii) ‘carbon traded’.

The Group are concerned that all projections of growth in demand for cargo handling, freight forwarding and Other airport-related logistics land are significantly above past trend based projections in all these scenarios, and therefore that **the evidence base for the new London Plan will need to be revised to address this.**

SI 1 Improving air quality

The policy and definition of AQFA Fig 9.1 (broadly around Heathrow and M4) is **consistent with the Outcome Statements adopted by the HSPG and welcome.**

Policy T3 and Table 10.1

Policy T3 and Table 10.1 Indicative list of transport schemes include Western and Southern Rail Access to Heathrow which are described as “required for airport expansion”.

While the Group would not disagree with this statement the Outcome Statements adopted by HSPG identify these both as being necessary now for the existing, two-runway airport.³

Policy T8 Aviation

In general terms the Policy is **consistent with the demands in the Group's own adopted Outcome Statements.**

Conclusion

Overall, the new London Plan policies and approach is consistent with the Outcomes Statements agreed by the members of the Group. However, the Group is concerned that the evidence base for the new London Plan has not adequately addressed the additional impact of airport expansion for growth in the area, impacting the demand for housing, employment and infrastructure (including Green and Blue, transport and social infrastructure) and the environment. The Group believe it necessary to work collaboratively to address Heathrow Airport expansion under 2-runway and 3-runway scenarios.

The Group request that GLA and TfL constructively engage with the HSPG in collaborative joint planning work to assess and plan for the impact of airport expansion; this work is fully consistent with emerging Policies T8 and SD1, SD2 and SD3. The timetable dictated by Government for the progress of NPS and DCO makes it a matter of urgency for this collaborative work to commence now.

Yours sincerely

Enc: Outcome Statements – Heathrow Strategic Planning Group

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

*Version 26/10/17 as amended by Lead Members Board for adoption as part of the HSPG Accord.
(Amendments made in response to LMB highlighted in yellow)*

Heathrow Strategic Planning Group

Outcomes Statement / Key Messages for Heathrow Expansion

Introduction and Purpose

- a) The Full Members of the Heathrow Strategic Planning Group¹ have agreed a set of short, high level outcome statements or key messages that are the focus the work of HSPG. **These describe what the Group want to see being achieved for an expanded airport and associated infrastructure delivery, whether based on two or three runways.** The draft document was considered in detail at the HSPG Summit meeting (27th July 2017), further refined and then agreed by the Lead Members Board of **Full Members of the Heathrow Strategic Planning Group (HSPG)** on 26/10/17.
- b) The outcomes statement addresses the different perspectives on the work and role of HSPG and those of its sub-groups namely:
- What Heathrow Airport Limited (HAL) require from HSPG to **progress its application for a Development Consent Order (DCO)** – for example engagement in pre-application work, the evolution of consultation proposals, design options, scoping of evidence requirements etc. Much of this is set out in the Masterplan Development Scheme Manual.
 - What HSPG members need to **determine the acceptability and focus of HAL’s DCO proposals** - an understanding of the impact of and mitigation needed to support the full operational expansion of Heathrow, the risks if appropriate mitigation is not provided, and an understanding of the impacts of construction and the identification of appropriate planning conditions (DCO requirements). The key focus is on the successful operation of the Airport in 2030 with airport campus related road traffic no greater than it was in 2013, together with meeting the wider needs in the area.
 - What local planning authorities and other bodies require **to fulfil the duty to cooperate and help deliver HSPG’s vision to “achieve integrated sustainable**

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development” in their Local Plans in the context of accommodating the wider identified growth requirements plus those that will be generated by Heathrow’s expansion across the ‘area of influence’ and the timing of Local Plans.

- Identify the **broad parameters for a joint spatial planning framework** including a focus on the successful operation of the Airport in 2040 (or such earlier date when at full planned capacity with up to an additional 260,000 air traffic movements per year (ATM) and airport campus related road traffic no greater than it is today), and beyond **together with meeting of wider needs arising in the wider ‘area of influence’**.
- c) Encapsulating the expectations that are being sought by HSPG members in a set of short high-level outcome statements will provide a focus for engaging with the four perspectives set out above and focus the work programme.
- d) The more there is agreement on the appropriate outcomes being sought by HSPG and by HAL the more streamlined the work programme can be (because all of the work is focusing on assessing and testing the same outcome). In these circumstances, it would be reasonable to expect that HAL will meet the cost of all of the work being undertaken. Where there are differences of view work will need to be undertaken reflecting those differences, with the aim of an agreed evidence base between HSPG and HAL, with Statements of Common Ground and submissions drawing out the different conclusions reached on that common data and evidence.
- e) HAL has already commenced technical assessment work in a number of areas and so it is important that HSPG sets out its expectations so that HAL can take account of them as it progresses work on the DCO. Otherwise, there is a risk that HSPG will find its role reduced to just reacting to HAL’s evidence and proposals.

A Draft Outcomes Statement

- f) The draft outcomes statement has been derived from HSPG’s response to: HAL’s Masterplan Development Scheme Manual; the Government’s Draft Airports National Policy Statement (ANPS); the ‘Vision and Development Principles’ document prepared by Grimshaw’s for HAL and HSPG; and the Department for Transport’s (DfT) Appraisal of Sustainability of options. **The outcomes statement is not exhaustive but covers the critical shared areas of concern to HSPG members. Drawing on this the HSPG will jointly make detailed and specific representations as appropriate, and individual members organisation may make further and more specific individual representations where appropriate.**

HEATHROW STRATEGIC PLANNING GROUP

OUTCOMES STATEMENT

Scope of the Outcomes Statement

- g) This statement sets out the outcomes that the members of the HSPG agree should be secured in respect of the planned expansion of Heathrow and which will steer the work that is undertaken through HSPG.
- h) Most of the outcomes set out below will need to be considered spatially, on two geographical levels:
 - i. The Heathrow ‘campus’ – the area of the DCO and other land, buildings and associated development related to the airport or which will be required for airport campus development by 2030
 - ii. The wider ‘area of influence’ subject to growth directly and indirectly impacted by Heathrow expansion and over which Member organisations have a Local Plan making role

and for several phases / time periods:

- iii. Submissions on the ANPS, and pre-application and Development Consent processes – from now onward
- iv. Enabling works and main construction phase for the DCO works, potentially from the early 2020s onward
- v. Position at 2030
- vi. Position at 2040.

(See Maps 1 and 2 produced for reference at **Appendix A** the end of this document)

1. Economy

- 1.1 Direct employment opportunities, training opportunities and apprenticeships for local residents maximised, including for the over 50’s and 10,000 new apprenticeships delivered by 2030 (HAL’s pledge).
- 1.2 Capitalise on the careers and skills opportunities to be created through Heathrow expansion to increase diversity of economy / employment and promote opportunity. This will include an

airport skills academy to be funded as a condition of commencing construction for airport expansion.

- 1.3 Employment land necessary for the expanded airport to function successfully and to replace existing employment floorspace that is displaced, to be clearly identified along with related development and infrastructure including surface transport investment to support the expanded airport within the 'campus' and in the context of the area of influence (see above).
- 1.4 From construction phase onward, maximising the opportunities within the supply chain, with a particular focus on supporting SMEs.

2. Placemaking – Heathrow as part of a powerful network of urban and economic centres

- 2.1 To capitalise on the airport as a catalyst for regeneration and inward investment, and as a positive attribute of the unique identity of the wider area characterised by the relationship with Heathrow.
- 2.2 A sustainably planned future network of complementary urban and economic centres that together perform a powerful role as Britain's Gateway.

3. Environmental impacts

- Air quality

- 3.1 Development and implementation of an air quality strategy to enable National Air Quality Objectives² to be achieved as quickly as possible and then continuous reduction in concentration levels of polluting nitrogen oxides and particulates and carbon monoxide to improve air quality in target areas.
- 3.2 An enforcement and binding intervention regime e.g. Clean Air Zone and /or Ultra Low Emission Zones. Planning and sustainable design should aim to deliver reduction in public exposure to harmful roadside pollutants.

- Noise

² Compliance with the EU air quality objectives will mean strategy should seek alignment with London wide/London Plan policy objectives aimed at 'zero emissions transport infrastructure' by 2050 or earlier.

- 3.3 The Group seek the early publication of the projections of noise impact for future airport and airspace so that the range of options and impacts can be fully understood and considered.
- 3.4 Compulsory scheduled night flight ban for a minimum period 11.30pm – 6.00am.

- 3.5 Design of airspace to lead to a reduction in numbers of people experiencing significant adverse effects (using 54dBLAeq threshold as onset of significant annoyance and 51dBLAeq threshold for assessment in accordance with Government recommendations for airspace change and frequency of overflight measures to compare options).³
- 3.6 Provision of reliable, predictable periods of respite and relief including full runway ‘alternation’.
- 3.7 Independent Commission on Civil Aviation Noise (ICCAN) to oversee and advise on mechanisms and penalties to ensure noise targets are met; to operate with full independence from the CAA and HAL.
- 3.8 Community compensation package including a noise insulation / compensation schemes for residential and other sensitive uses (buildings and open areas), with associated regular reporting requirements on progress. The mitigation and compensation package provided by the Airport should be World class and proportionate to the impact of the expanded airport; eligibility should apply equally to existing and new premises.

4. Surface Access

- 4.1 No increase in airport related road traffic to / from the *airport campus* (as promised by HAL & DfT) above the 2013 baseline⁴ and clear action if monitoring shows this is not being achieved. This should relate to the wider local and strategic road network and cover traffic generated by passengers, airport employees and those employed in associated services and supporting businesses, freight and deliveries.

³ To address inequalities in public health outcomes, overarching policies and/or strategy need to reduce public exposure to excessive noise and frequency of noise events, to levels specified in the WHO.

⁴ ANPS2 refers

4.2 Binding mode share requirements (applying to the area defined above) for passengers and staff based on the targets set out in the draft Airports National Policy Statement (public transport mode share of at least 50% by 2030 and 55% by 2040 for passengers and a 25% reduction in all staff trips by 2030 and 50% by 2040 from 2013 levels) applying to the airport campus area.

4.3 Western Rail Link to Heathrow and Southern Rail Access⁵ and associated service pattern and station strategy. These rail schemes would fill recognised gaps in the rail network serving a

two runway Heathrow and they should be an ‘essential requirement’ to be in place at the outset of the operational phase of the expanded airport and at full service operating capacity as a condition for the airport being able to operate at full capacity or by 2040 whichever the sooner. These two together with (a) new bold strategy for the local bus network to serve the area (including ‘green buses’, incentives and ticketing arrangements), and (b) pedestrian / cycle transport connections to be included as essential components of the Surface Access Strategy that supports the DCO. Such requirements and obligations to also be part of HAL’s Operators Licence granted by the CAA or successor body.

4.4 Development and implementation of a sustainable freight strategy as part of the no net increase requirements and obligations.

5. Biodiversity

5.1 Designated sites for nature conservation protected and enhanced and local wildlife sites and undesignated habitats conserved and enhanced with ongoing monitoring, maintenance and management. Where loss or harm is unavoidable, biodiversity off-setting to be delivered.

6. Green and Blue infrastructure

6.1 Green and blue infrastructure strategy to maximise the opportunity to enhance green and blue assets, including (a) enhancement of areas such as the Colne Valley Park and Crane Valley Corridor, taking opportunities for a strategic network of multi-functional use (including but not restricted to river corridors); (b) improve access to the countryside and to local opportunities for sport and recreation, and (c) compensate and mitigate any losses or harm.

⁵ The Colne Valley Park CIC does not support western rail access or some of the southern rail access options

7. Design and character

- 7.1 Highest quality design for all development, including infrastructure, throughout the campus, with external appearance that is respectful of setting of the surrounding local context and character. To include landscape screening, breaks and buffers to protect and enhance the character and visual amenity of surrounding areas, including where impacting the setting of surrounding public open spaces and green belt.
- 7.2 A coherent strategy to minimise severance and enhance access between the airport campus and surrounding areas include walking and cycling links.

8. Heritage

- 8.1 Designated and non-designated heritage assets and wider historic environment to be conserved and opportunities taken to investigate, better understand, enhance and celebrate local assets.

9. Flood risk and water quality

- 9.1 No increase in flood risk.
- 9.2 Quality of surface and ground waters protected.
- 9.3 Connectivity and function of the rivers and waterbodies of the lower Colne Valley maintained and where possible enhanced, including consideration of re-opening culverted rivers where appropriate.

10. Resources and waste

- 10.1 The proposal should be a 'flagship' of sustainable design and construction to:
- minimise consumption of non-renewable resources and maximise use of sustainably sourced aggregates, and
 - minimise construction and demolition waste sent to landfill.

10.2 There should be a presumption that all construction material and waste is introduced to / exported from the site by rail unless specifically justified and impact on the road network of transporting materials during construction minimised.

11. Compensation

11.1 Fair compensation to residents whose homes will be compulsorily acquired.

11.2 Compensatory works to all sensitive uses impacted by noise to defined standard (existing and new flight paths to same standard).

11.3 Communities compensation scheme at an expanded airport proportionate to the harm caused by expansion⁶. HSPG consider this should commence with the construction phase.

12. Housing and social infrastructure

12.1 Implications for the local and wider housing market and social infrastructure (including schools and health sector) of new jobs associated with the airport and related development, including travel to work implications, to be clearly researched and identified using study specification agreed with HSPG. This to consider the impacts on the objectively assessed need for housing and employment land and across all sectors of housing including market, private rented sector and affordable housing, over all the phases of growth outlined above.

12.2 Development of a joint strategy to address distortions to local housing markets. e.g. Programme of Article 4 Directions to manage the conversion of family houses to HMO.

12.3 Housing for construction workers sited in the most sustainable locations in respect of direct environmental impacts, accessibility to areas of construction, and opportunities to re-use empty or new homes.

⁶ ANPS para 5.236 refers. The Airports Commission considered a sum of £50m per annum appropriate (with indexation)

