



Further submission to the draft London Plan EiP by the Heathrow Strategic Planning Group (2478)

Matter 87 Aviation Policy T8

About the HSPG and further context

1. The role, objectives and membership of the Heathrow Strategic Planning Group (HSPG) are detailed in our original submission and further submissions to Matters 14 and 16. HSPG members comprise local authorities, local enterprise partnerships and one third sector organization, covering the core functional economic area¹ surrounding Heathrow Airport – both within Greater London and into the Wider South East. The work involves officer level and political level joint working with strategic decision making by a regular political Leaders Meeting².

2. 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 strategic planning and management of the impacts and help maximise the benefits and compensation any expansion of the airport has to the local economy, communities and the environment.

3. The Group work constructively with Heathrow Airport Limited (HAL), Department for Transport and other government departments, and the Heathrow Community Engagement Board (established following the Airports National Policy Statement (Airports NPS)). HAL are not a member of the Group. The Group is constructively

¹ The LB Hillingdon have **declined** to join the Group and the Mayor of London (GLA and TfL) has **withdrawn** from engagement with 'observer' status.

² Terms of reference, structure and governance arrangements are set out in an adopted Accord

engaging with HAL in their preparation of proposals for consenting through for Development Consent Order and the Civil Aviation Authority's Airspace Change processes.

4. Furthermore, the members are collaborating and engaging with HAL over the joint planning across the sub-regional area – this work principally funded through a Planning Delivery Fund grant from MHCLG. Our submission on Matter 14 a) described how we 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; and
- 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 draft London Plan).

5. 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 and a form of Southern Rail Access, and transformative bus network changes made possible through airport expansion. The intention is to agree³ initial parts of a Joint Spatial Planning Framework before the airport expansion DCO is submitted in 2020, so that becomes part of the policy framework against which the DCO is examined. The HSPG is also working on other joint strategies and projects around transportation, green and blue infrastructure and other matters. **We can advise the Panel further of progress at the hearing in May at which we will be represented.**

M87(a) Are all of the requirements of Policy T8 necessary to address the strategic priorities of London, or do they cover matters that are dealt with by national policy and/or would be more appropriately dealt with through local plans or neighbourhood plans?

³ To be agreed by HSPG members via the Leaders Board

6. We have no additional written comment to add to our original response that “In general terms the Policy is consistent with the demands in the Group’s own adopted Outcome Statements” (which are attached to our original submission). However, Heathrow Airport Limited’s (HAL) draft proposals are evolving rapidly, and so we may wish to make further comment in the hearing session in May.

(b) Are changes to Policy T8 and/or other parts of the Plan necessary to ensure consistency with national policy relating to Heathrow including the Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (June 2018)?

7. We note the Mayor of London’s response to the Panel’s Preliminary Question 13, to the effect that no changes to the draft Plan are considered necessary.

8. In our previous responses to the examination we submitted that Policy SD2 ‘Collaboration in the Wider South East’ and Policy SD3 ‘Growth locations in the Wider South East and beyond’ are fundamentally necessary and should be acted upon now; we also sought a minor wording amendment to Policy SD1 in relation to the Heathrow/Elizabeth Line Opportunity Area, and the collaborative engagement with the Mayor of London ‘family’ in joint planning work.

9. We also sought additional references to critical rail infrastructure to access Heathrow at Policies SD1 Heathrow/Elizabeth Line, Policy T3 and Table 10.1. We supported Policy S1 in relation to Improving Air Quality.

10. We request that the Panel have regard to our previously submitted statements in this matter. Our key point is to seek the positive collaboration of the Mayor of London in joint working with the HSPG. The likely submission of a DCO is approaching rapidly and proposals are developing rapidly, the need for constructive engagement is more urgent than ever.

end