

FAO Becky Coffin
 Director of Communities and Sustainability
 Heathrow Airport Limited
 Via Email

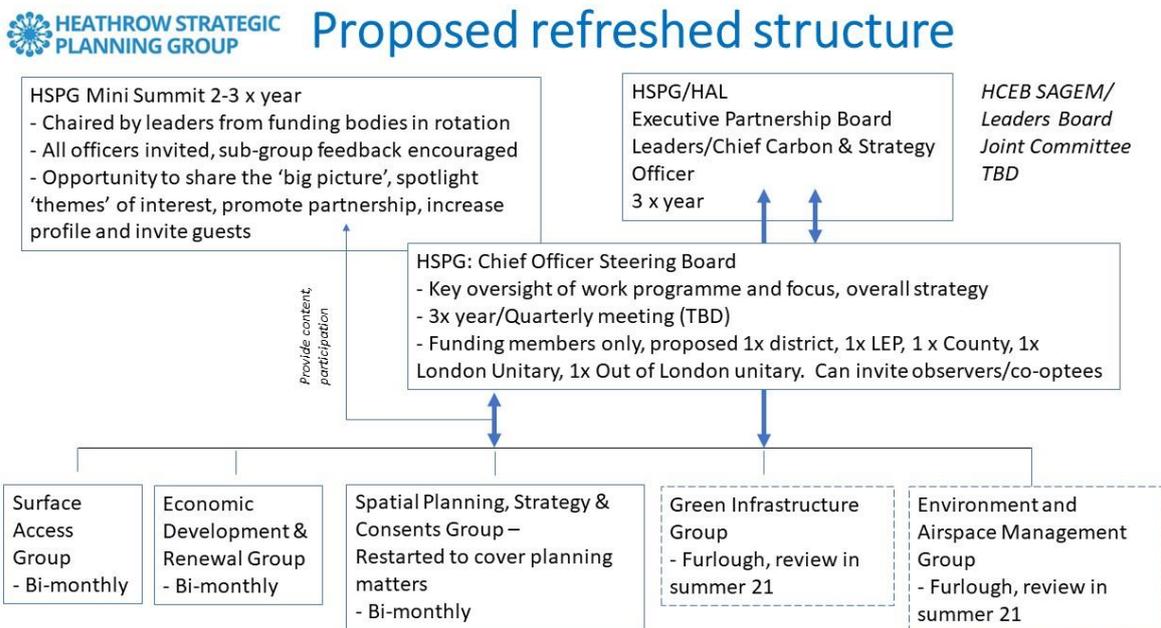
12/02/2021

Heathrow Strategic Planning Group (HSPG) response to Heathrow Airport Limited's (HAL) consultation on community engagement

Dear Becky,

The Heathrow Strategic Planning Group (HSPG) welcome the opportunity to respond to this important consultation on how the airport engages with its key institutional and community stakeholders.

The HSPG is unique in providing an umbrella organisation bringing together the majority of Local Authorities (LAs) and Local Economic Partnerships (LEPs) situated within the airport's functional economic area. We provide more information about HSPG's background and current membership in the appendix to this letter. The latest summary of the group's structure is below for convenience - note this is currently the subject of active discussion amongst the membership.



All our members are themselves locally democratically accountable to the local community, or can otherwise link back to them via the presence of representative elected members in their governance. We are well placed to serve as both a key sounding board in respect to HAL's dealings with the community, and also as experts in how that engagement is best undertaken. HSPG

members therefore welcome the opportunity, jointly and bilaterally, to assist in further dialogue over these emerging proposals.

Initial observations

Over the past 12 months, with the cessation of all expansion work and an agenda shifting almost exclusively to resilience and recovery in the face of the pandemic, clear evidence of a need to provide better clarity on the roles of the different stakeholder fora discussing Heathrow matters has emerged. In addition, questions have been raised around duplication and over whether the focus of these fora remains appropriate given the vastly changed context in which we all operate. The statutory requirements and guidance that Heathrow maintain an Airport Consultative Committee (ACC), a Noise Action Plan and a Noise Forum remain unchanged, however as you have noted, relevant best practice in community engagement has just been published by ICCAN which we support and believe needs to be taken account of.

Given highly constrained resources on all sides as a consequence of the impact of the pandemic, we therefore agree with HAL that it is timely to review these arrangements to better address the areas which most require focus at this time, and remove duplication wherever possible. Indeed, HSPG has recently undertaken a similar process of review and rationalisation in respect to our own governance and areas of focus. Having previously been focussed almost exclusively on planning issues arising from the DCO application process, we are now closely involved in plans for longer term economic renewal of the sub-region, including how we can 'build back better' and support a green recovery. We are also working closely with your transport colleagues to help inform the development of a new surface access strategy that best supports the wider needs of the subregion – including actively supporting that return to growth and contributing to our shared aspirations for decarbonisation.

We are looking forward to working closely with HAL to maximise all possible collaboration opportunities arising from our new structure and the new approach to engagement that will be adopted by the airport following this consultation. We now offer some ideas for how that enhanced collaboration that may be practically achieved.

Removing duplication in your engagement of technical experts

Having reviewed current arrangements, we note the following specific potential areas of duplication between the HAL and Heathrow Community Engagement Board (HCEB) fora and HSPG technical working groups.

- HSPG Surface Access and Environment & Airspace Management Groups and the HCEB advisory groups, particularly the TENAG group. There are also links to Heathrow Area Transport Forum (HATF).
- HSPG Environment & Airspace Management Group and the Heathrow Community Noise Forum (HCNF) (in many cases the same Local Authority officers sit on both of these groups)

HSPG has had success in refining focus and purpose in order to eliminate confusion, or duplication between, fora covering the similar territory. We believe our perspective on how this has worked in practice may be useful for HAL, a couple of examples are provided below.

- The HSPG Surface Access Group could very easily duplicate the work of HATF. However, through careful coordination the relationship has instead become symbiotic. HSPG represents the views of local authorities and LEAs on the HATF strategic board via the chair of our Surface Access group. This helps provide balance to that board (which could

otherwise be dominated by LA voices) whilst also saving time for busy LA/LEP officers through pooling their representation. Engagement with HATF is strengthened through regular flows of information between them and the Surface Access Group and careful management by the HSPG secretariat to ensure that any concerns and issues raised by members are reported back to the chair of HATF. All HSPG members still have the opportunity to engage directly with HATF via the wider forum events, held once or twice a year. In return, HAL and HATF is able to develop close partnerships with ten statutory highway and planning authorities, providing space for the tailoring of projects and interventions to ensure they are optimised in respect to their potential value to both parties.

- Similarly, the process followed in the setting up of the Noise Envelope Design Group (NEDG) for the DCO back in 2019 could also provide useful learnings. This brought together a panel of key stakeholders in a meeting size and balance of representation that was conducive to constructive engagement in order to inform efficiently what was a vastly complex (and contentious) process of progressing airspace change. HSPG worked hard to ensure that feedback from these meetings was relayed to all our members, and in turn their feedback was tabled at the NEDG as appropriate. Members also pooled resources to bring in a specialist expert to help inform their positions, streamlining policy responses and saving public money. This model could be used to augment the work of the HCNF as a way to provide a focussed space to discuss technical noise issues with local authority officers and other key institutional stakeholders. Representation from LAs on such a group could be provided through the chair of our Environment and Airspace Management Group, supported by the HSPG secretariat. We would make clear that the HCNF is a body strongly supported by ICCAN guidance and should remain the forum for discussing airport related noise. However a successor to the NEDG could provide an agile sounding board and operate as a useful 'sandbox' to discuss emerging concepts in this space, and for the airport to get initial reactions on those from key stakeholders.

This model of shared representation of the LA/LEP voice via HSPG, feeding into more focussed strategic fora hosted by HAL, potentially coupled with less frequent wider forum events or conferences, could be a useful one for HAL to explore in other areas of your work.

For example, the Heathrow Local Recovery Forum in its current format has a relatively large cast of disparate stakeholders. Whilst positive in terms of a wide reach for the materials and proposals produced, such a large membership could come at the expense of the focus and depth of engagement, and flexibility in responding to events. Developing a tightly knit strategic steering group with pooled LA/LEP representation via HSPG (e.g. via the secretariat and/or chair of our Economic Development and Renewal Group) alongside a smaller number of key stakeholders and regular but less frequent wider stakeholder meetings, could help provide additional focus to the overall coordination of the recovery process - as it does for HATF and did for the NEDG.

In respect to the HCEB TENAG, HSPG sits on this group and finds it an interesting forum to discuss technical issues relating to surface access, noise and other environmental matters. There are a diverse array of subject specific experts and communities of interest engaged and their input into the debate on Heathrow matters is valuable. It is not clear whether this group will continue under HCEB's revised remit, but given the value they bring it would be useful to explore how these voices can be brought into the debate. Some of this input could be achieved via presentations at wider forum events such as hosted via HATF for example and through the HCNF and perhaps also via participation at the HSPG mini-summits. The community concerns raised in this meeting are likely to be of key interest to the more locally focussed forums that will remain or emerge following this consultation.

Streamlining political engagement

In terms of political engagement, there is clear overlap between the HCEB quarterly forum, and the previously established Strategic Advisory Group for Elected Members (SAGEM) group, and HSPG's leaders board - with the same representatives often sitting on all these groups. This is sub-optimal and has been raised as a concern to us by Leaders who do not have capacity to attend duplicate meetings, particularly at this difficult time.

In the HSPG's revised structure we have proposed an executive partnership board, providing a regular space for focussed conversation between elected leaders/portfolio leads and senior HAL staff. This could in effect replace the HCEB SAGEM panel.

Using a similar model to HATF and the NEDG, our executive partnership board could also potentially formally feed into revised HCEB forum either through a nominated representative or a rotating arrangement amongst leaders/portfolio leads – supported by the HSPG secretariat. Alongside other changes (e.g. pooling of community representation) this could support the HCEB in developing into a more focussed strategic stakeholder forum, maintaining representation from each of the groups named in the DfT guidance but across a more manageable number of board members than perhaps existed at the HACC in its former incarnation. To ensure some direct engagement remains this could be augmented by a less frequent wider forum event with the full cast of local stakeholders, as per the HATF model. This approach would need further discussion with elected members around the details of how such collective representation would work in practice, but the principle of it is one for which there is some support amongst our members.

Neighbourhood vs strategic engagement

HSPG do recognise the difficulty in engaging both locally and strategically, and that one mechanism or approach cannot successfully do both. Neighbourhoods at each end of the runways will have both similar and very different interests, and overflowed communities further afield quite different concerns.

HSPG does not as a rule engage on specific local issues that are within the purview of a single member. However, HSPG does aim to articulate the aggregate of similar local interests, and cross boundary or joint strategic positions. There is currently little direct link between HSPG and the Local Focus Forum or Local Liaison Groups, however it could be that matters highlighted at these meetings could be helpfully discussed at (or even formally referred to) HSPG meetings so establishment of such a link may be beneficial. For example, common concerns about managing local parking matters would be within purview, and interest, of members attending our surface access group. Strengthening this link could be beneficial both for our members and HAL's reputation with community stakeholders.

More generally we would note that having clearly defined and different spaces for conversations on intensely local matters impacting on specific neighbourhoods, and the more strategic issues that come to the fore across a wider geography, is clearly key in maximising participation and the two-way value arising out of the airport's engagement activities.

Collaboration on research and technical studies

We also think there would be value in exploring more co-commissioning of technical studies such as the recent work undertaken by Oxford Economics to assess impact of the pandemic on the sub-region, or some of HSPG's previous work with HAL during the DCO on developing a Joint Strategic

Planning Framework and Joint Evidence Base and Infrastructure Strategy. As well as avoiding duplication of effort and resource, joint commissions to a joint brief are most likely to lead to 'agreed' data on which all sides are then perfectly free to draw their own conclusions – hence why this approach is preferred by the Planning Inspectorate and National Infrastructure Commission etc.

As a further point on the future engagement approaches Heathrow and HCEB might adopt, HSPG members were generally very positive about the polling work undertaken early on in the HCEB's existence, which sought to better ascertain the views of those not represented on the various bodies and groups the airport typically hears most from. This exercise offered genuine insight and it is hoped that this sort of activity could be maintained by a revised HCEB in future, possibly utilising a panel type approach to allow longitudinal comparison in attitudes and key issues over time.

Conclusion

To finish, we believe that HSPG is unique in being the only organisation that draws its membership from across the whole of the Heathrow functional economic area, picking up key stakeholders for HAL both inside and outside of the Greater London Authority boundary. Representing LAs and LEPs it reflects bodies that have legal functions and duties and that are accountable themselves to communities of interest through established democratic processes. LAs / LEPs are well placed and ready to act collaboratively as 'critical friends' working with Team Heathrow to deliver a successful airport.

With positive developments in securing future engagement by the London Boroughs of Hillingdon and Richmond we have the potential to be a genuine 'one stop shop' for HAL's engagement with all key LA and LEP officers and elected members across the sub-region. We believe we are therefore potentially a very valuable tool for HAL - both in helping to cost-effectively widen your engagement output, but also in offering the opportunity to bring an increased focus to that engagement with more widespread use of the strategic board model. This could be an exciting basis for building a strong Heathrow sub-regional partnership which can skilfully promote the area's unique identity, strengths and needs to national government and indeed internationally. Such unified place-based marketing across a disparate range of stakeholders is considered to be particularly important given the pressures brought on the public purse by the pandemic, as well as increased political focus on levelling up which is likely to lead to investment being steered away from the South East.

An enhanced collaborative role may require additional resource and we would look to work with HAL to identify how best that resource could be provided, confident that through working in partnership we would be maximising the cost effectiveness of both public and private resource for this agenda as far as practicable. We look forward to further discussions about how we can collectively develop the relationship to all parties benefit over the coming weeks.

Yours sincerely,



Mark Frost

Associate Director, HSPG
On Behalf of HSPG members

Appendix 1: HSPG background and Structure

The Heathrow Strategic Planning Group (HSPG) is a constituted grouping of ten 'willing' local authorities and local enterprise partnerships¹ responsible for much of the functional economic and travel to work area around Heathrow Airport.

Our principal interest is to support the sustainable future of both the sub-region and the airport, and we lobby for greater recognition and engagement with this perspective. We are committed to fostering a genuine joint collaborative multi-agency approach towards the future planning of the whole of the functional economic area surrounding Heathrow Airport - both inside and outside of the GLA boundary. This encompasses all elements of planning, including transport, economic development and environmental considerations.

The Group is led by a Leaders Board of member's political and executive leadership, supported by a small secretariat. We host a variety of working groups with representation by technical officers from across our membership.

History of HSPG

The Group formed was formed in late 2015. It is independent of Heathrow, but constructively engages with them on issues of shared importance. The individual members hold a range of views on the proposed third runway and the Group does not adopt a position on this; however we are united in supporting a more sustainable and successful future airport and recognising it as the key strategic economic driver of this functional economic area.

This is an important collaboration across a complex sub-region, subject to the combined and cumulative impacts of a number of national infrastructure project proposals, and straddling a mixed administrative (and political) geography to the Western side of London, across the Greater London boundary and with LAs and LEP's reaching over three (former) County areas.

Scope of the HSPG

The Group collaborates across the whole range of economic, social and environmental aspects of the operation of the airport, and acts a conduit between the members and HAL, Government, Planning Inspectorate, specialist aviation interests such as LGA SASIG and ICCAN, neighbouring area interests (including the West London Alliance of London Boroughs) and airport related stakeholder groups such as the Heathrow Area Transport Forum and Heathrow Community Engagement Board.

The Group is deeply involved in the development of a surface access strategy for the airport, ensuring this is integrated with wider needs of the sub-region. This includes a particular interest in

¹ Full Members of the HSPG (and signatories of an 'Accord') are: Elmbridge Borough Council, Enterprise M3 Local Enterprise Partnership, London Borough of Ealing, London Borough of Hounslow, Royal Borough of Windsor and Maidenhead, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council, Thames Valley Berkshire Local Enterprise Partnership
Other organisations have 'Observer' status and participate in certain activities, including: Buckinghamshire LEP, Buckinghamshire Council, Wokingham Borough Council, London Borough of Richmond, Colne Valley Regional Park, relevant Government agencies including DfT and MHCLG, and the West London Alliance (of London Boroughs). The Group works closely with aviation interests and Heathrow and airport stakeholder groups such as Heathrow Community Engagement Board and Heathrow Area Transport Forum.

the critical need for new rail infrastructure, buses and active travel measures to drive modal shift in amongst both passengers and airport workers.

In relation to Heathrow's Northwest Runway expansion plans, the Group provided 'pre-application' engagement with Heathrow, and also collaborated on developing shared understanding of forecast economic, land use and transport growth scenarios to inform expansion plans. To this end, and with financial support of a Government Planning Delivery Grant, the Group prepared a non-statutory Joint Spatial Planning Framework (JSPF) and associated drafted Statement of Common Ground; and an Economic Development Vision and Action Plan (EDVAP) (Feb. 2020). This process enabled the broad agreement of strategic principles for the spatial development around the network of places of the sub-region, centred on Heathrow - identifying priority areas for growth and infrastructure interventions to ensure more sustainable surface transport options, ways of ensuring continued prosperity and a wide range of opportunities for local communities. It also highlighted how investment in blue and green infrastructure could improve the sub-region's environmental performance and the quality of life of residents. These documents continue to help provide a strategic framework for local plan-making and help facilitate collaboration between HAL, tiers of local authorities, local enterprise partnerships, transport bodies and scheme promoters, infrastructure providers and Government.

2020 and the response to Covid-19 pandemic

With the hiatus caused by the Supreme Court challenge to the Airports National Policy Statement followed immediately by the Covid-19 pandemic slowdown, the group have reorientated in a slimmed down format to provide a focus on: (a) Covid-19 impacts on the airport communities and recovery planning, including a refresh of the EDVAP (b) input into Heathrow revisions of their surface access and sustainability strategies.