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Date: 19<sup>th</sup> December 2017

Emailed to: [RunwayConsultation@dft.gsi.gov.uk](mailto:RunwayConsultation@dft.gsi.gov.uk)

Dear Sir/Madam,

**Re: Consultation on Revised Draft Airports National Policy Statement (October 2017)  
Comments by Heathrow Strategic Planning Group**

We have pleasure in providing the Heathrow Strategic Planning Group (HSPG) written submission to the revised draft Airports National Policy Statement (October 2017). HSPG welcomes the opportunity to comment on the revised draft Airports National Policy Statement. Since submitting our previous submission matters have moved on; the Group has now adopted a formal Accord to govern the work of the Group with a Lead Members Board to provide more immediate strategic political direction, and adopted an Outcomes Statement that summaries the Groups objectives – this is attached as **Annex A**.

Individual member organisations and local authorities may be making their own representations to the consultation. Our response to the consultation question is set out below.

**Surface Access**

The HSPG are concerned that the revised NPS does not adequately recognise the existing local context into which the airport expansion is to be made. In particular, the severity of existing congestion problems on the road and public transport networks to access the airport. We welcome that Heathrow Airport and the Government have committed to no net road traffic increase if expansion takes place but this fails to address the clear need to improve on the existing situation regardless. In short, new western and southern rail accesses are needed to serve the expansion achievable within the existing ATM cap using two runways. The two rail schemes should be progressed as a matter of urgency irrespective of the programme for the NPS and DCO.

The new evidence presented clearly states passenger demand will grow faster than first expected, this underlines the need to improve surface access sooner than first anticipated to Heathrow airport with or without third run-way expansion.

Surface access is a priority within the context of Heathrow in its current state and an even more so with an expanded airport. Expansion without additional sustainable surface access to the airport will result in the airport not becoming successful, not meeting the national air quality and other sustainability requirements nor achieving the committed modal targets. No evidence been presented that the modal targets can be achieved without the use of additional direct rail routes from the south and west. Interchange at the airport will also facilitate orbital rail movements to the west of London and the new network of locations served provide the basis of bus and other sustainable transport measures.

It is necessary for any international airport to have adequate surface access; therefore, it is more vital now for the NPS revision to identify the development of Southern Rail Access and Western Rail Access as 'essential' to be delivered 'now'. HSPG recommend the Airports NPS needs to make it clear that a Southern Rail Access to improve connectivity between the south and Heathrow Airport (along with a Western Rail Link) is an essential component of the Surface Access Strategy for an expanded Heathrow and we consider that the final NPS should require both these schemes to be in place **before any new runway comes into operation**. We believe, in line with the Airports Commission Interim Report conclusions, that the case for Southern Rail Access has been made for the existing two runway airport. New evidence for passenger demand to grow faster than first expected reinforces this view and underlines the need for a decision and progress on a Southern Rail Access to be progressed urgently<sup>1</sup>.

The NPS emphasis on surfaces access relates only to alterations to the road network required to permit the building and operation of an expanded airport and meeting passenger and staff transport related mode share targets. The assessment principles in the NPS must enable consideration of the wider impacts of an expanded airport capable of accommodating 260,000 additional air transport movements a year and the additional growth in the wider area that this will fuel. In particular, this needs to be reflected in any transport modelling evidence in support of the DCO not just traffic generated by passengers, airport staff and those in ancillary on airport businesses, but also for the essential and directly related off-airport uses in the local area and ancillary uses within the airport and defined DCO 'redline' area. The NPS should be much clearer the scope of the transport assessment work to be should be done, including key assumptions.

## **Sub-Regional Impacts**

The HSPG wish to see firm requirement within the NPS regarding the need to plan for wider impacts of expansion upon housing, employment and infrastructure demands in the 'area of influence' impacted by any airport expansion together with the considerable levels of background growth. There are significant demands and impacts (both positive and negative) on the local economy and markets for employment buildings and land, housing, skills and labour that a functioning successful airport is dependent upon. These will inevitably converse more widely and cross administrative boundaries. This requires the cross-boundary working relationship between local authorities, Local Enterprise Partnerships and transportation bodies together with Heathrow

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<sup>1</sup> The Colne Valley Park CIC does not support western rail access or some of the southern rail access options

Airport. We believe that it is imperative to produce a joint baseline evidence base and assessment of the demands of expansion upon the economic, social and environmental dimensions of sustainable development. Once a joint evidence base and understanding is achieved then the appropriate way to move forward jointly can be determined, potentially with a Joint Spatial Planning Framework for the sub-region or 'area of influence' identified.

While the revised passenger demand forecasts clearly show a rise in demand sooner than previously anticipated, political and economic uncertainties clearly make reliable forecasting over a 20-25 year period extremely difficult. The HSPG would welcome that the government 'take a view' and provide clear leadership with clear forecast figures and also require contingency planning by all relevant organisations to address the reasonable spread of alternative projections. Based on these figures the DCO and Local Plans can plan for associated growth in demand for land uses.

Greater monetised benefits are evident in the revised NPS which refer to an increase in benefits to the economy based upon all options considered by the Airports Commission. The wider economic benefits are outlined in para. 5.1 of the *Updated Appraisal Report* stating "*Airport expansion is transformational in nature and its impacts on the economy go beyond the direct effects on passengers, airports, airlines and the Government. Expansion brings businesses and people closer together and in turn has the potential to increase productivity*". This is welcomed, however, the NPS needs to recognise financial benefits will inevitably have impacts upon local infrastructure, a whole range of different local businesses, local communities and upon the local/wider environment. Para 3.49 of the revised NPS states there will be a negative impact upon the environment, with the monetary benefits outweigh those environmental impacts. This should be carefully scrutinised and we support a change in wording as this impacts and mitigation will not be clearly known until the results of the Environmental Impact Assessment are fully assessed.

Whilst HSPG welcome economic benefits, these should not be at the total expense of local communities and the local environment. It is vital that the NPS remain consistent with the principles of sustainable development as set out in the NPPF para 8 '*...to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions*'. This strengthens the need for a joined-up approach that ensure improvements in all dimensions of sustainable development and supports the case for a Joint Spatial Planning Framework.

### **Air quality**

We welcome the wider range of mitigation measures referenced in the revised draft NPS and the inclusion of an emissions based access charge as a potential measure to control congestion and emissions from vehicles. However, it is critical that the air quality impacts of expansion take into consideration the full geographic extent of the impacts of surface transport (and aircraft) emissions. We have found the revised draft NPS and the supporting Appraisal of Sustainability lacking in an explanation of the absolute differences that updated factors for NO<sub>2</sub> emissions have made to projected air quality impacts.

Ultrafine particulate pollution from aircraft is now recognised as affecting lung health and particularly populations up to several kilometres downwind of airports. While no 'standards' exist for this pollutant at present, given the scale of expansion proposed the NPS should require the applicant to assess potential ultrafines emissions and impacts on local air quality.

The Airports NPS should require the applicant to produce an air quality strategy in support of its application for development consent and/or the inclusion of an objective measuring and enforcement mechanism to ensure air quality obligations are met by Heathrow Airport

Should you have any questions or require any further information, please do not hesitate to contact me at [admin@heathrowstrategicplanninggroup.com](mailto:admin@heathrowstrategicplanninggroup.com).

Yours sincerely



**Brendon Walsh**  
**Chair of the Heathrow Strategic Planning Group**

On behalf of the following HSPG member organisations:

- London Borough of Hounslow,
- Slough Borough Council,
- South Bucks District Council,
- Buckinghamshire County Council,
- London Borough of Ealing,
- Spelthorne Borough Council,
- Runnymede Borough Council,
- Surrey County Council,
- Thames Valley Berkshire LEP,
- Bucks and Thames Valley LEP
- Enterprise M3 LEP, and
- Colne Valley Park CIC

Annex A – HSPG Outcomes Statement

## Annex A

*As adopted by Lead Members Board as part of the HSPG Accord.*

# Heathrow Strategic Planning Group

## Outcomes Statement / Key Messages for Heathrow Expansion

### Introduction and Purpose

- a) The Full Members of the Heathrow Strategic Planning Group<sup>2</sup> 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 development” in their Local Plans** in the context of accommodating the wider

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<sup>2</sup> The Full Members of the HSPG are: Buckinghamshire County Council, Colne Valley Park Community Interest Company, 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, Thames Valley Buckinghamshire Local Enterprise Partnership.

Other organisations have ‘Observer’ status and participate in some of the activities of the HSPG.

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 Objectives<sup>3</sup> 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**

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<sup>3</sup> 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 54dB LAeq threshold as onset of significant annoyance and 51dB LAeq threshold for assessment in accordance with Government recommendations for airspace change and frequency of overflight measures to compare options).<sup>4</sup>
- 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 baseline<sup>5</sup> 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.
- 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.

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<sup>4</sup> 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.

<sup>5</sup> ANPS2 refers

- 4.3 Western Rail Link to Heathrow and Southern Rail Access<sup>6</sup> 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.

## **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.

## **7. Design and character**

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<sup>6</sup> The Colne Valley Park CIC does not support western rail access or some of the southern rail access options

- 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 expansion<sup>7</sup>. 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.

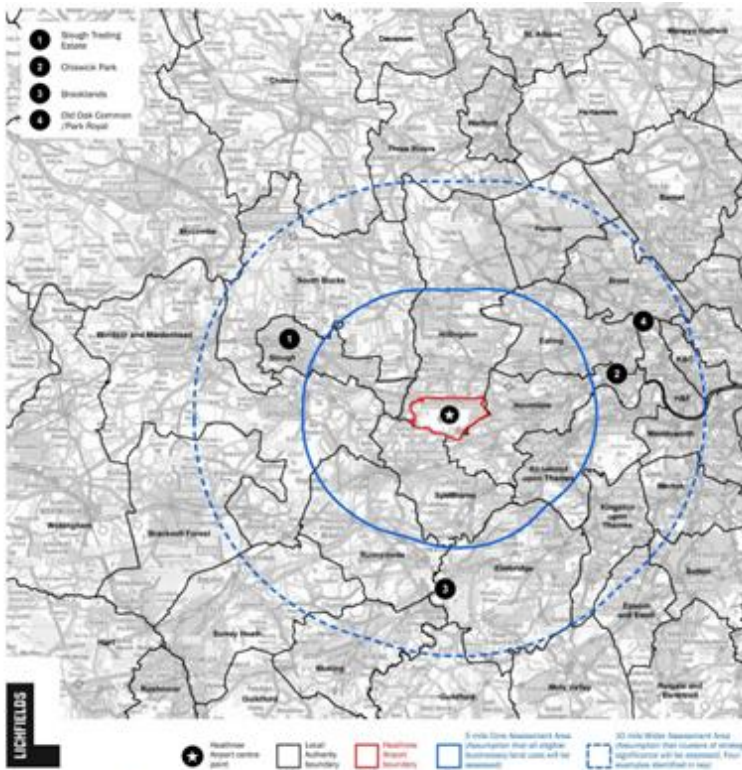
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<sup>7</sup> ANPS para 5.236 refers. The Airports Commission considered a sum of £50m per annum appropriate (with indexation)

## Appendix A – Maps 1 and 2



Map 1 - Showing the local authority areas nearest LHR Airport.



Source: Lichfields analysis

Map 2 – The most direct local economic relationships with the Airport impacts are found within a 5 mile radius, together with more focussed impacts over a wider area. (5 and 10 miles contours shown).