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Lillian Greenwood MP
Chair
Commons Transport Select Committee

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Date: 1 February 2018

Dear Chairperson

Airports National Policy Statement - points of elaboration and clarification regarding the oral evidence presented to the Transport Select Committee (TSC) on 15th January 2018

Thank you for the opportunity to present evidence to the Select Committee on 15th January, this was a very interesting session with the Committee swiftly addressing a range of highly pertinent aspects of the Heathrow expansion proposals. In response to the discussion we thought it may be helpful to follow-up with a few points of elaboration on the written and oral evidence presented by the Heathrow Strategic Planning Group (HSPG).

The planning requirements and obligations that the Airports National Policy Statement might require of any Development Consent

Clearly it is important that any Airports National Policy Statement (NPS) send a clear instruction to the Examining Authority to ensure the critical targets and requirements of airport expansion are obligated in binding terms in the terms of the Development Consent Order. At present the NPS includes a number of rather vague statements and aspirations that need to be redrafted into robust requirements. For example, it currently states:

“Heathrow Airport should continue to strive to meets its public pledge to have landside airport-related traffic no greater than today... The airport will be expected to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040....” (3.50)

“The scheme... will be accompanied by a package of measures to mitigate the impact of airport expansion.... This will include ... the offer of a predictable... period of respite...” (3.52)

Heathrow Airport... announced compensation packages...which stands at more than £1billion” (3.53)

... “government... expects a ban on scheduled night flights....” (para 5.61)

The NPS should make clear that the DCO must provide that suitable ‘pre-commencement requirements’, ‘planning requirements’ (construction and operational phases) and (s.106) ‘planning obligations’ to ensure the achievement of these aspirations as obligations and standards. The examples above are to illustrate a general point, there are a range of other important references too.

The references to Air Quality standards are critical, here the objective goes beyond meeting a minimum standard but to engage the promoter and other developers in a process of continuous improvement to exceed and improve on statutory requirements.

The Heathrow expansion project is different to many previous DCO National Infrastructure Projects in that: it is being built into a very busy urban area; and the massive local impacts of the construction phase will be exceeded by that long term effects of operation.

It would be helpful if the NPS were to acknowledge this and require the DCO to set out the most appropriate routes and Decision Makers for resolving the various ‘local’ impact planning requirements and obligations as well as the more ‘principle’ matters such as those above.

Public transport mode share targets and definition of landside airport-related traffic

The NPS needs to be explicit that applications for Development Consent must set out how the targets for public transport mode share will be met. A critical ambiguity of the NPS is that it is not clear about the geographic area over which the ‘no more traffic’, modal shift, air quality and other targets apply.

The NPS should make clear that the concern is for all surface traffic directly related to the airport (including movement of freight) – whether the traffic is originates to/from within the airport perimeter fence, or off-airport sites containing directly related airport uses, regardless of the position inside or outside of the DCO ‘redline’ area.

Pre-requirements to be satisfied before increasing the ‘cap’ on the maximum number of Air Traffic Movements (and other suitable metrics)

It is the position of the HSPG that additional airport capacity created should only be brought into use once the obligated pre-conditions are achieved – be it a traffic modal share target, exceedance of air quality standards or delivery of packages of specific infrastructure, mitigation and compensation measures. i.e. We envisage a series of stepped increases in capacity permitted by the satisfaction of pre-conditions rather than a simple timed phasing of say 2030 or 2040. It is suggested that the simplest and most effective control will be to ensure new ‘slots’ are not released ‘to market’ until the pre-conditions are confirmed by the Consenting Body to be satisfied.

The key areas of monitoring must be robust with comprehensive and sufficient resources provided by the applicant/operator to allow these to be independently reviewed by the relevant Consenting Body to then agree the release of new capacity or if necessary, take effective action to ensure compliance with operating conditions.

Future monitoring and future variations of planning conditions

The NPS should make clearer the process for varying planning requirements and obligations after the completion of the consented DCO works. For example, is it envisaged that the Secretary of State will remain the Consenting Body or will some or all of this task pass to the local planning authorities for some matters? Requirements should reflect emerging best practice through building in a flexible monitoring approach to ensure appropriate modifications can be taken forward. Best practice indicates that processes should be embedded within the DCO that enable both material and non-material amendments to be undertaken within the codes as agreed and set out.

It is likely to be desirable to review and amend the consented details, for example, the approved programme of flight operations (to refine the programme of alternation of the three runways and/or flight paths or the parameters of the ban on night flights) to provide the best possible package of ‘predicable periods of respite’ to local communities. This is likely to involve consultation with relevant organisations and local communities.

The physical works may extend over five or six local planning authority areas and the surface access routes and flight operations reach further still. It is the view of HSPG that monitoring and compliance will require a group of local planning authorities (and others) to act jointly with one point of contact with Heathrow Airport – potentially building on the model now established by the HSPG, with Slough Borough Council (or another body) acting as the ‘accountable body’. The NPS could usefully suggest this option to the Examining Body to consider.

Surface Access including new rail access routes

There was wide spread recognition at the Committee of the vital need for new rail access routes to be implemented more quickly given the updated air traffic forecasts. The HSPG are firmly of the view that two new routes are needed now to serve the existing two-runway airport. These two schemes should also be recognised in the NPS as an ‘essential requirement’, which offer significant benefits in transport modal shift and CO2 savings

equating to approximately 30million road miles a year, on one of the busiest stretches of the UK's motorway network. The two schemes enjoys wide support from the Thames Valley, Wales, South West and South and West London¹.

Whilst the concept of Western Rail Access is well understood and subject to a future DCO, there is great uncertainty about Southern Rail Access; currently this is pursued outside of the Airports NPS/DCO and Government and Heathrow are leaving matters to four or five different scheme promoters. This approach is not achieving necessary progress and it is the view of HSPG that we now need clear leadership from DfT to support, properly compare and then select a preferred option and sponsor its progress. Transport Select Committee is asked to send a strong message to the Secretary of State in this regard.

Joint Spatial Planning Framework to address the wider impacts on local authority areas

The Planning Act (2008) and advice from the Planning Inspectorate notes that local planning authorities may produce supplementary planning documents to address the wide-ranging impacts of a large NSIP project. However, practice suggests these can receive scant regard by the Examining Authority.

As referred in our evidence, the HSPG and HAL have commenced on preparing joint evidence base and infrastructure studies to understand these wider impacts, and the HSPG will then consider the most effective approach for addressing this and other 'background' growth demands by preparing a Joint Spatial Planning Framework (JSPF) to address the wide range of related development requirements of airport expansion across the airport sub-region. This work would reflect Parliament's decision on the NPS and so should be not be in conflict with the content of the NPS, but can provide valuable elaboration and expansion over a wider area and range of impacts.

To this end the HSPG have bid (January 2018) to the Ministry of Housing, Communities and Local Government for Planning Delivery Funds (Annex A bid) for funding for this joint plan making work. Critically this funding will enable the independent work (from HAL) necessary to address the full range of sustainable planning dimensions across a wide area and consider the management of demands against the background of significant housing growth requirements across the area. In the event that this bid is unsuccessful then some other form of Government support is essential.

The HSPG propose that same recognition of the value of a JSPF approach is included into the NPS, and would also welcome any support the TSC can offer the bid for funding support.

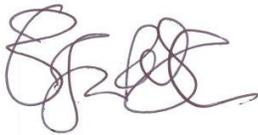
Interface of Airspace Change and the NPS

¹ The Colne Valley Park CIC is a full member of the HSPG does not support the currently proposed route so the Western Rail Access and some of the proposed options for Southern Rail Access

The management of operation of the alternating use of runways is understood to be controlled by the NPS / DCO process, the routing and alternation of flight paths by the Airspace Change process. To fully assess and manage the total impact of airport expansion on local communities it is necessary for these two processes to be more closely integrated. The NPS merely states that the CAA (managing the Airspace Change process) will be statutory consultees of the DCO. The NPS needs to be more precise about how this relationship should work; it is integral to addressing the concerns of the impacted local communities.

Should you have any questions or require any further information, please do not hesitate to contact me at 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