

Submission by the Heathrow Strategic Planning Group to the London Plan Review - Call for Evidence

Introduction

The members of HSPG – which includes authorities and other organisations on both sides of the London boundary - would welcome opportunity to engage in the programme for the review of both the London Plan and other strategies, and in work of the London and South East Group focussing on the future planning relationship of London with the Wider South East.

We believe that through HSPG we can bring a unique and important inter-, sub-regional and thematic perspectives to the review. The presence of the airport and the wider economic, social and environmental importance of the area we cover mean we will have a valuable perspective on the future development of London and the Wider South East – and on how these should be planned for.

Equally, we welcome the engagement of the GLA family of organisations in our own future work programme referred to below.

Role of HSPG

The HSPG was formed in 2015 in response to the proposed expansion of Heathrow Airport. Membership includes organisations¹ that support and those that oppose airport expansion, but all see great benefits of collaborative sub-regional scale working for the sustainable development of the airport and sub-region, to maximise the opportunities and benefits and reduce and mitigate the negative impacts that expansion could entail.

Following the Covid lockdowns and pausing of the airport expansion DCO the Group has shifted its focus and developed ways of working to better meet the arising and future needs of its members and the places and communities they serve. Members consider the Group is as necessary and valuable as ever and they continue to finance the Group with a small part-time secretariat.

The Group encompasses technical officer group working, strategic direction by political leadership and senior management, arranges the representation of LA leadership at the new Council for Independent Scrutiny of Heathrow Airport and the Heathrow Area Transport Forum, and arranges a regular summit session and newsletters open to stakeholders and partners. Further information on HSPG activity is available at the website² and current governance / organisation summarised at

Appendix 1

¹ Full members 2022-23 are: Elmbridge Borough Council, Enterprise M3 Local Enterprise Partnership, Heathrow Airport Limited, 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 Participants and Observers include: Buckinghamshire Council, Department for Transport (Aviation Teams) and other HMG depts, Environment Agency, Heathrow Area Transport Forum, London Borough of Hillingdon, Natural England, Strategic Aviation Special Interest Group (of the LGA), Thames Valley Buckinghamshire Local Enterprise Partnership, West London Alliance (of West London Boroughs), West London Business

²<http://heathrowstrategicplanninggroup.com/resources/latest-news>

A unique geography and sub-regional collaboration

The participants are responsible for most of the established (and evidence based) functional economic market area of Heathrow Airport. This area has a complex administrative geography, straddling the Greater London boundary and several traditional county areas. The group is now firmly established and funded, and is widely recognised by regional, sub-regional and local stakeholders. The value of this unique perspective was also recognised by government in the 2018 award of a Planning Delivery Fund grant for joint strategic planning work in this area and the ongoing working relationships of HSPG has with HMG departments.

The geographic reach of the HSPG is well placed to support engagement between the Mayor of London family and bodies in the Wider South East on the future review of the London Plan – (Policies SD2 and SD3 refer). The HSPG membership is uniquely a hybrid of authorities within and without London as well as Local Enterprise Partnerships and business organisations, but with a common functional focus on an area that relates to the London Plan ‘Elizabeth Line sector’ and the traditional ‘Western Wedge’ (A40/M4/M3 corridor) reaching beyond the London boundary Westward.

The HSPG area also relates well to the currently ‘undefined’ Heathrow Opportunity Area – a location where a hybrid approach to OAPF reaching beyond the Greater London boundary into adjacent boroughs / statutory planning regimes would be worthy of exploration. (Such an approach was posited to and noted by the examination to the current London Plan). In the coming years HSPG will engage with HAL in relation to airport related development demand that reaches beyond the aerodrome into surrounding areas, including the future airport masterplan, surface access strategy and energy infrastructure planning.

As the impacts of the pandemic demonstrate, the Airport is a key node in the region’s economy and spatial development – and will be whatever happens in terms of expansion or changes to operations in a two-runway situation. A particular focus of our current work is planning for the pandemic recovery, mitigating local impacts and working for a sustainable future. Many of these issues straddle administrative boundaries and we would welcome exploring the scope for joint working to address them.

Focus of interest

The core of the work of the HSPG is joint strategic spatial planning, economic strategy and sustainable surface transport planning, together with close collaboration on technical issues around airport operations, airspace, aircraft noise and emissions. In recent months we have also prioritised strategy and action to support economic recovery and develop propositions to support innovation, achievement of coordinated Net Zero energy infrastructure planning and local carbon off-setting – see work programme summary below and **Appendix 2**.

A key theme is realising the multiple ‘hub’ functions of the wider Heathrow Airport campus can play for the sub-region: as an integrated surface transport hub to the West of London area; and a key energy hub; business hub; and sustainability hub.

Publications and evidence

Amongst the existing publications of the Group which will be of value to the review of the London Plan are:

- **Joint Spatial Planning Framework** (HSPG Feb 2020) – a non-statutory strategy with Vision and Objectives looking out over three phases to 2050; this is predicated on the NW Runway scheme required by the Airports National Policy Statement³.
- **Joint Evidence base and Infrastructure Study** – (HSPG and Heathrow Airport - 2018-20). A series of studies reviewing evidence of the extent of the airport’s relationship with the sub-region, ‘background’ growth demand in housing and employment and infrastructure, and the additional demand from alternative projections (including commissioned) for airport related growth in airport related demand in the sub-region arising from airport related economic growth (Direct, Indirect, Induced, Catalytic). Also, infrastructure requirements.⁴
- **Economic Development Vision and Action Plan** (HSPG Feb 2020) – a sister strategy to the JSPF exploring economic opportunities and impacts with an action focus for positive change.⁵
- **Position Statements** (HSPG 2019-2020) – a range of HSPG position statements on subjects including surface access, environment, airspace, and blue and green infrastructure, all in response to the emerging airport expansion proposals.⁶
- **Heathrow 360** (HSPG June 2021) – orientation and review of the EDVAP, identify new areas of action amidst the Covid recession and heightened climate emergency.⁷
- **Southern Rail Access (Surrey CC, HSPG, WSP 2021)** – making the case for southern rail.⁸

Covid-19 and climate change

The impact of Covid pandemic lockdowns on aviation have been particularly devastating to airport communities with some of the highest job loss figures in places such as Hounslow, Ealing, Slough, Crawley and Luton. Action is required to ensure communities in these areas are not “left behind” in the eventual recovery. The direct impact on airports and airline services has rolled onto the related supply chain, hospitality and other sectors located in the sub-region⁹. Moreover, Covid has highlighted the importance of the airport infrastructure to the economy of the region and the many economic relationships and interdependencies. HSPG is determined to achieve positive change

³ <http://www.heathrowstrategicplanninggroup.com/resources/spatial-planning>

⁴ <http://www.heathrowstrategicplanninggroup.com/resources/spatial-planning>

⁵ http://heathrowstrategicplanninggroup.com/application/files/5915/8574/0515/EDVAP_Report_Final_March_2020.pdf

⁶ http://www.heathrowstrategicplanninggroup.com/application/files/5615/6223/4800/HSPG_Environmental_Position_Paper.pdf

⁷ http://heathrowstrategicplanninggroup.com/application/files/8216/2685/9999/HSPG_Economic_Vision_Final.pdf

⁸ [http://www.heathrowstrategicplanninggroup.com/application/files/2016/3639/4893/SATH - A Catalyst for Growth - Standalone Summary FINAL Rev Oct 2021 v2.pdf](http://www.heathrowstrategicplanninggroup.com/application/files/2016/3639/4893/SATH_-_A_Catalyst_for_Growth_-_Standalone_Summary_FINAL_Rev_Oct_2021_v2.pdf)

⁹ <https://wla.london/wp-content/uploads/2020/07/2020-June-Oxford-Economics-Report-for-WLA-Impact-of-Coronavirus.pdf>
<https://static1.squarespace.com/static/5abcb26f9772aee7f0dd7ec8/t/5f23e58b36e25f2f7739fb64/1596188045271/El+of+Heathrow+on+Ealing%2C+Hillingdon%2C+Hounslow%2C+Spelthorne%2C+Slough+and+South+Bucks+July+2020%5B2%5D.pdf>
<https://www.southeastlep.com/app/uploads/2021/07/Airport-towns-in-the-South-main-report.pdf>

through the Covid recovery and renewal. We consider that a sub-regional perspective to this brings unique opportunities and benefits to work alongside other action.

Covid also triggered and accelerated a range of societal changes including the future demand for local commuting and international travel. The future trajectory for aviation generally and Heathrow traffic specifically will likely be different than before, this influencing the various markets of passenger *and* cargo traffic.

Net Zero 2050 is driving market and policy changes impacting surface travel and aviation, however, airport expansions (at the Heathrow ‘hub’ airport and other airports serving London and the South East) remains government policy under the Airports NPS and MBU¹⁰. The HSPG’s work will help members make sense of and plan for whatever changes emerge in policy and regulation, markets and environmental concerns.

One specific work stream will help planners make sense of the future renewal scenarios and evidence needs, to consider the future demand for employment land – a very pressing issue to the West of London. We are also engaging with Heathrow and other stakeholders on practical steps to achieve zero carbon targets, including areas like Local Area Energy Planning and a local carbon offsetting proposition.

Many of these issues have distinctive sub-regional aspects or are areas where work at sub-regional level will amplify or add value to more local action. We would welcome engagement with the Mayor about how these can be taken forward and the role the London Plan can play in supporting this.

Responding to change – HSPG work plan

The range and pace of external, market and policy driven change and uncertainty makes future planning very difficult and throws up new challenges and opportunities, such as the need for joint energy planning so that pledges to take action on the Climate emergency and achieve Net Zero trajectories can be achieved.

Although the Government’s intentions regarding planning reforms remain uncertain, we are also keeping under review how we can help member authorities through any changes, particularly regarding requirements for cross-boundary strategic planning. We also maintain an interest in UK aviation and airports policy and wider discussions about planning for London and the Wider South East, with a particular perspective from our experience of producing an inter-regional joint spatial development framework.

This joint work shows that there are many challenges and priorities shared by authorities either side of the Greater London boundary including planning for energy and water, transport and other infrastructure, skills and training. They also face common issues arising from the government’s emerging “levelling-up” agenda and in making the case for funding and other resources required to support good growth across our area – particularly to support those airport communities that are at risk of being “left behind”. Again, these are issues where joint work in the future, both in policy development and practical implementation, could have much to offer.

The HSPG’s new priorities for 2022-2023 are currently being finalised – these are set out in **Appendix 2**.

¹⁰ Airports National Policy Statement (ANPS) – 2018. Making Best Use of Existing Runways (MBU) – 2018.

Request for engagement with the GLA London Plan review

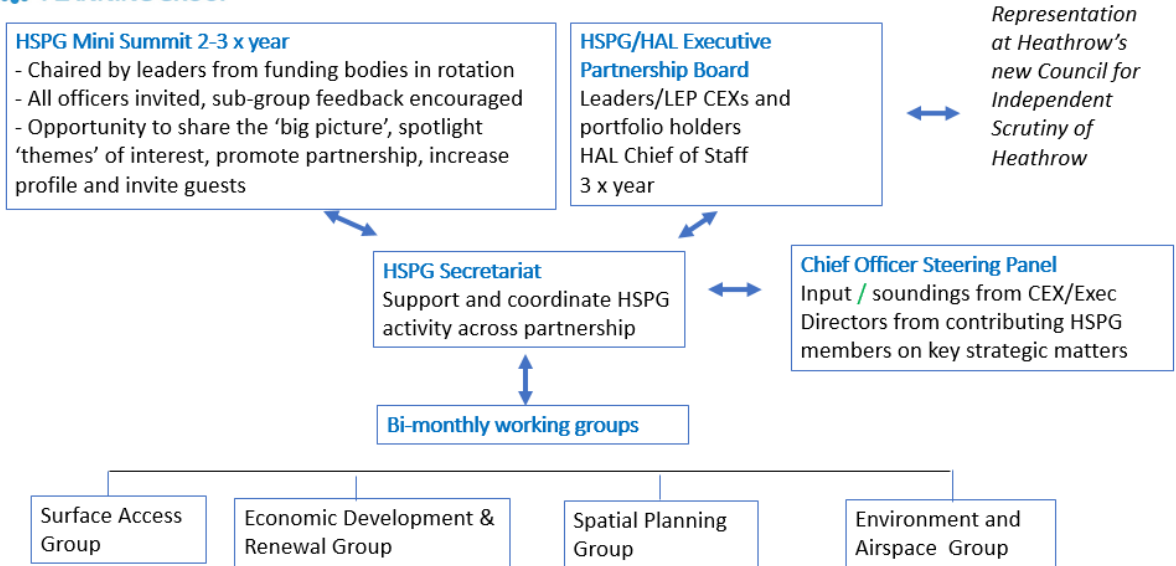
1. We would welcome the GLA's engagement with the HSPG work programme and the opportunity to contribute further to the review of the London Plan. We commend use of the published and developing evidence base and research of the HSPG to the London Plan team.
2. HSPG request representation at the London and South East forum established by the Mayor to facilitate dialogue on planning matters for Greater London and the Wider South East and East of England. (Ironically, because we representative of LAs within and without London that we risk not being nominated for representation by either camp). We commend our model of functional cross-London boundary corridor grouping of authorities to all parties as a useful addition to structures of London Councils' SEC, EECs etc.
3. We would welcome the collaborative engagement of the London Plan team, TfL and wider GLA family with the future work of the HSPG.

For further information please contact Michael Thornton Lead Advisor:
michael@heathrowstrategicplanninggroup.com

Appendix 1

HSPG organisation and governance – 2022-23

HSPG - Current structure



Appendix 2
Summary of (draft) HSPG work programme priorities for 2022-23

'Rowing'	'Steering'	'Cheering'
<p>Response to Heathrow 2.0 covering relevant activity for the wider HSPG area including identifying the infrastructure required to deliver sub-regional decarbonisation aspirations, building on the idea of the airport as an 'energy hub' and through the Local Area Energy Plan process.</p>	<p>Continue to lobby for further funding for improved sustainable transport infrastructure to the airport, notably western and southern rail access enhancements.</p> <p>Launching new position statement on Southern Access in partnership with HAL and DfT</p>	<p>Keep under review relevant UK and international aviation policy framework engagement, inc. Airport National Policy Statement refresh and UK Airspace Modernisation Strategy</p>
<p>Developing a 'Local Offsets Market' to secure funding into projects that deliver decarbonisation outcomes</p>	<p>Developing a sub-regional statement on interventions to support employment and skills given the impact of the pandemic; collaboration on opportunities for 'green skills'.</p>	<p>Continue collaboration across partnership on the London West Innovation District concept</p>
<p>Refresh of the Joint Strategic Planning Framework, and inform any work on new airport masterplanning. Undertake airport and logistics and employment land demand studies, and collaborate on other joint evidence studies and investigations to help inform the revised framework</p>	<p>Representations to CAA as economic regulator of the airport in order to secure further attention is paid, and funding released for, partnership priorities – particularly around decarbonisation and mitigating negative impact of the airport on communities.</p>	<p>Continue collaboration on spatial planning and economic renewal across the GLA boundary, including through the Wider South East Strategic Planning Network</p>
<p>Optimisation/ decarbonisation of freight and logistics activity in the area – analysis and options study</p>	<p>Making representations to Heathrow Airspace Change Process, night flying and noise policies (support collaboration by members – conduit to HAL, CAA/DfT and wider world for best practice)</p>	<p>Make representations as appropriate to relevant consultations on strategic transport infrastructure requirements for the sub-region, including those undertaken by Great British Railways, National Highways (new Road Investment Strategy) and National Infrastructure Commission (National Infrastructure Assessment).</p>
<p>Submit bid to National Highways Designated Fund for active travel improvements across sub-region linked to proposed Heathrow Local Cycling & Walking Improvement Plan (LCWIP)</p>		