

London Borough of Hounslow
The Civic Centre
Lampton Road
Hounslow
TW3 4DN
Your contact: Brendon Walsh
Email: Brendon.walsh@hounslow.gov.uk
Tel: 020 8583 2000
Date: 30th March 2017

Transport Select Committee
House of Commons
London
SW1A 0AA

Dear Sir,

R.E.: House of Commons Transport Select Committee Inquiry on the Department for Transport's draft Airports National Policy Statement (NPS)

Please find attached The Heathrow Strategic Planning Groups written evidence to the House of Commons Transport Select Committee's Inquiry on the draft Airports National Policy Statement.

Should you have any questions or require any further information, please do not hesitate to contact me, Michael Thornton (Convenor of the HSPG) via email on admin@heathrowstrategicplanninggroup.com / tel: 07933 715615 or Ajit Bansal (Principal Environmental Strategy Officer) via email on ajit.bansal@hounslow.gov.uk /tel: 020 8583 3275.

Your sincerely



Brendon Walsh
Chair of the Heathrow Strategic Planning Group
(Executive Director of Regeneration, Economic Development and Environment at LB Hounslow)

On behalf of the following HSPG member organisations:

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

Please note that whilst Buckinghamshire County Council and the Royal Borough of Windsor and Maidenhead are members of the HSPG, they are not signatories to the enclosed response.

**RESPONSE OF THE HEATHROW STRATEGIC PLANNING GROUPS RESPONSE TO THE
HOUSE OF COMMONS TRANSPORT SELECT COMMITTEE INQUIRY ON THE
DRAFT AIRPORTS NATIONAL POLICY STATEMENT**

30th March 2017

1.0 INTRODUCTION

- 1.1 *The Heathrow Strategic Planning Group (HSPG) welcomes the opportunity to take part in the House of Commons Transport Select Committees Inquiry on the draft Airports National Policy Statement (NPS). This response is submitted on behalf of the HSPG, where individual authorities have special points to make, the member will make these directly.*
- 1.2 Heathrow Airport is a key economic driver for West London and the wider M3/M4 corridor. The airport together with its supporting uses and infrastructure outside of the perimeter fence has a very significant impact across the sub region: spatially, socially, economically and environmentally, that cuts across administrative boundaries. It is widely acknowledged that any expansion in activity at the airport, whether as a two runway or three runway airport, will have an impact on its immediate and wider surroundings.
- 1.3 The Heathrow Strategic Planning Group was formed in 2015 to enable collaborative working towards delivering better strategic spatial planning and to best manage the harmful impacts, compensation and maximise the benefits that will result from expansion of the airport. The adopted Terms of Reference of the Group are attached at **Appendix 1**.
- 1.4 Membership of the Group is open to all local authorities and bodies responsible for the area. Initiative to start the Group came from the London Borough of Hounslow and Heathrow Airport Limited, and membership currently consists of nine local authorities, three Local Enterprise Partnerships¹ and the following additional organisations have observer status: Greater London Authority, Transport for London, Department for Communities and Local Government, Department for Business, Energy and Industrial Strategy, Colne Valley CIC, Highways England, West London Alliance and Old Oak and Park Royal Development Cooperation. Heathrow Airport Limited (HAL) attend part of all meetings and it is a key objective of the Group to work collaboratively with airport operator. Meeting of the Group have been attended or received presentations from representatives of the Department for Transport (Aviation team), Planning Inspectorate National Infrastructure team. The Group maintains a public website at: <http://heathrowstrategicplanninggroup.com/>
- 1.5 It is acknowledged that each member of the Group has its own individual policy positions on a third runway, and membership of the Group does not require any particular position of support or opposition of airport expansion. The Groups key remit is to cooperate for planning authorities own Local Plan making, respond to Development Consent Order prepared by HAL and to act as a collective point of communication with government and others on issues of common concern around processes, resources and infrastructure.

¹ Heathrow Strategic Planning Group are London Borough of Hounslow, Slough Borough Council, South Bucks District Council, Buckinghamshire County Council, London Borough of Ealing, Spelthorne Borough Council, Runnymede Borough Council, Royal Borough of Windsor and Maidenhead, Surrey County Council, Thames Valley Berkshire LEP, Bucks and Thames Valley LEP and Enterprise M3.

- 1.6 The Group has considered the Terms of Reference of the Inquiry and our response focuses primarily on the proposal i.e. the draft Airports NPS and how this needs to be developed in terms of spatial planning for the wider sub region and not just the Northwest Runway scheme development.
- 2.0 CLARITY OF THE PROPOSAL IN TERMS OF SCOPE AND ITS APPLICABILITY TO OTHER AIRPORT EXPANSION APPLICATIONS IN THE SOUTH EAST**
- 2.1 *The HSPG are concerned that while in the most part the draft Airports NPS addresses the construction of one runway option at Heathrow Airport, it fails to adequately address the definition of the ‘airport’ and all the other aspects of development and infrastructure necessary to enable this runway to be utilised. Nor does it adequately address other qualifying development at other airport locations, including at the nearby RAF Northolt.***
- 2.2 The draft Airports NPS provides the primary basis for decision making on development consent applications for the Northwest Runway at Heathrow Airport – but is also intended to address any other nationally significant development² of airport infrastructure in London and the South East of England. The purpose and scope of the Airport NPS given (from paragraph. 1.10), and the territorial extent (referred to in para. 1.20) are both beyond the identified development and ‘red-line’ area defined in paragraph 1.36. Clarity is therefore needed about the actual purpose and spatial scope of the NPS. At present crucial additional information is needed both if the NPS is to be used for airport capacity across the SE, or for Heathrow’s NW runway option only.
- 2.3 It is clear that the background and the scope of the draft Airports NPS is based on the work undertaken by the Airports Commission who recommended the Heathrow Northwest Runway Scheme and the additional work that was undertaken by the Government. However we believe that this additional work does not adequately consider the scope for and implications of works at other airports located in the South East of England, nor does it provide guidance of the impacts that other airports need to consider and address when considering expansion that may not be related to the construction of a runway but may lead to additional capacity in the form of increasing:
- At least 10 million passengers per year and/or
 - At least 10,000 air transport movements of cargo aircraft per year.
- 2.4 If the draft Airports NPS is to be key document that the Secretary of State refers to as part of its decision making process when assessing DCO applications, then the HSPG believes that the document needs to be more widely evidenced than just on the work of the Airports Commission to focus on the wider strategic aviation agenda and other locations than Heathrow. In particular, we note that RAF Northolt lies outside the scope of this policy but we would like confirmation that any increased commercial use of this airbase will not be countenanced by the government and therefore allay concerns that this might become either an alternative third Heathrow runway or even a fourth runway.
- 2.5 The Group also believes that the full range of benefits and harmful impacts of the airport reach over a far wider area than any DCO ‘redline’. Many activities that directly and indirectly related to the airport are located well beyond the operation airfield boundary and the full range of economic, social and environmental impacts are similarly felt beyond this ‘red line’. The draft Airports NPS must ensure that the content and consideration of any DCO fully recognises this, if the benefits of the airport beyond the ‘redline’ are to be highly regarded, then so must the harmful impacts. If the Heathrow Northwest Runway Scheme is

² Which meets the criteria outlined in the Planning Act (2008).

to be the governments preferred scheme for increasing airport expansion in the South East then any development at Heathrow Airport should carefully consider the relationship with this wider area, and this opportunity taken to act as a springboard and a catalyst to delivering new levels of sustainable development across the wider sub region, and that it should not just stop within the scope of the red line boundary as identified in Annex A of the proposal.

2.6 At present, the draft Airports NPS states that: 'Under Section 104 of the Planning Act 2008, the Secretary of State must decide any application in accordance with any relevant NPS unless he or she is satisfied that to do so would:

- Lead to the UK being in breach of its international obligations;
- Be unlawful;
- Lead to the Secretary of State being in breach of any duty imposed by or under any legislation;
- Result in adverse impacts of the development outweighing its benefits; or
- Be contrary to legislation about how the decisions are to be taken

2.7 We believe that the Secretary of State will not be in a position to properly assess the DCO application under Section 104 of the Planning Act 104 unless the Airports NPS also:

- Outlines and clarifies the key criteria, targets and sanctions for not complying with national and local statutory obligations; and
- Requires the promoter and decision maker to have regard to all aspects of delivering development in line with the NPPF, Local Plans and other spatial planning documents and evidence bases produced by local authorities.

2.8 As an example, this Group of local authorities responsible for the area of greatest impact believe that the Heathrow Northwest Runway development, once operational would be in breach of EU air quality targets unless very significant progress is achieved or a wide range of requirements that have not been included in the Airports NPS as yet, have been delivered. Within the proposed red line boundary and the airport perimeter, the applicant has claimed that they are complying with EU air quality targets. But we believe that the air quality issue extends beyond the perimeter to a wider 'campus' and impacts authorities neighbouring the airport who are currently in breach of air pollutant targets. Therefore the applicant should also consider air quality data and evidence from outside of the red line boundary across the area where surface access activity to the airport 'campus' is mapped to be significant. An important distinction and relevant is compliance with the National Air Quality Objectives which are enshrined in UK legislation. Reference needs to be made to our National legislation to ensure leaving the EU does not obfuscate responsibility for the promoter to meet air quality targets.

2.9 The draft Airports NPS only refers to the airport in terms of the runway length and the air traffic movements that are permitted within the scheme. It does not clarify what is meant by the 'airport' boundary/perimeter. Many essential and directly related airport uses are located outside of the 'airport' perimeter fence – on a wider airport 'campus' and beyond: such as offices, passenger car parks, 'bonded' logistics/freight forwarders, hotels and other logistics and range of support industries and services. We believe that in order for neighbouring authorities to hold the airport operator to account, the government needs to incorporate a definition of the surrounding 'airport campus' area impacted by uses that are directly related to the airport within the NPS. Current investigations being undertaken for operator are establishing the extent of industrial uses directly and indirectly related to the airport. Without this clarification as a starting point, local authorities will be unable to plan for the exact impact of the scheme (in terms of spatial planning) within their area.

Regardless of individual Group member's positions on airport expansion, local authorities have a duty to produce and deliver a Local Plan document in cooperation with neighbouring authorities in relation to strategic and cross-boundary matters and to implement Air Quality Action Plans where air pollution concentrations are in breach of National Air Quality Objectives.

2.10 Whilst we acknowledge that the Appraisal of Sustainability (AoS) is required by the Planning Act 2008 in relation to any NPS, the evidence and rationale contained within the AoS only applies to the scheme located within the red line boundary. Paragraphs 1.23 – 1.26 in the proposal states that AoS 'describes the analysis of reasonable alternatives to the preferred scheme' but paragraph 3.11 states that other shortlisted schemes do not represent true alternatives to the preferred scheme. The government needs to clarify if other variations of the preferred scheme have been identified and assessed. We believe that the AoS should also focus on the surrounding area which will be impacted by the scheme especially if the Secretary of State will use the NPS and the AoS as a framework assessing the applicants DCO proposals.

2.11 The draft Airports NPS places emphasis on the applicant to submit further detailed studies such as an Equalities Impact Assessment, Habitats Regulation Assessment and a Health Impact Assessment. Whilst the Group welcomes this, we would argue that the applicant should also consider the impacts not just within the scheme boundary but also consider the impacts on relevant wider surrounding area impacted by the development. This needs to be stated clearly within the proposal.

3.0 HOW WELL THE PROPOSAL REFLECTS GOVERNMENT POLICY ON AIRPORTS AND AVIATION MORE GENERALLY

3.1 *The HSPG do not wish to comment in detail on how well the proposal reflects government policy on airports and aviation more generally as this is outside the spatial remit of the Group but as mentioned earlier it is vital that the draft NPS includes the scope for and implications of works at other airports in the Southeast of England.*

3.2 However, Heathrow Airports past form on expansion is not reassuring, with previous commitments not to expand given with the consents of Terminal 4 and Terminal 5 both being reneged upon. Whilst the airports commitment to be being a 'better neighbour' is welcomed the draft Airports NPS needs to explain how any further expansion (including any potential satellite sites such as RAF Northolt) will be controlled by government.

3.3 We would also like assurances that any new domestic routes that would duplicate long distance rail and coach services plus generate significant commuter traffic (e.g. Bristol, Cardiff, Manchester etc. would be ruled out.

4.0 THE SUITABILITY OF THE GOVERNMENTS EVIDENCE AND RATIONALE IN SUPPORT OF A NORTHWEST RUNWAY AT HEATHROW

4.1 *Given the scale and irreversibility of the infrastructure to be invested, a more cautious approach should be applied to the acceptance of critical evidence of air quality and other impacts, requiring demonstration that alternative contingency strategies are available to address failures in any one technique. For example, if Euro VI commercial vehicles fail to achieve the 'real world' performance indicated by manufacturer testing.*

- 4.2 The government has based the foundation of the draft Airports NPS on the evidence and rationale provided by the Airports Commission (AC) who played a valuable role in examining the need for additional airport capacity in the south east. Following the endorsement of the Commission's recommendation, the government undertook further work on areas such as air quality, the strategic road network, mitigation measures etc. before proceeding with the draft Airports NPS. Whilst many local authorities in the sub region commented on the Commission's Final Report, we believe that the evidence and rationale submitted by the Commission and assessed by the government does not address all the impacts of the proposal on communities situated and impacted by the airport development.
- 4.3 For example, the air quality analysis undertaken by the Commission and the government implies that expansion at Heathrow is allowed to proceed on the basis that air pollution in other parts of London are currently worse off than within the Heathrow zone. We strongly disagree with this and believe that if the government continues to take forward this position then the UK would be in breach of its international obligations and the adverse impacts of the development would result in outweighing its benefits.
- 4.4 Furthermore, it appears that the government is placing a lot of emphasis and reliance on new technology and further anticipated advances, such as assuming that all vehicles will be Euro VI compliant, and that the vehicles will then achieve this performance in 'real world' use resulting in a reduction in air pollutants which will ensure that the area around the airport is compliant with EU limits. Recent experience must cast some doubt on this. We believe that if this is not the case and that the Secretary of State should assess the schemes compliance with the emerging Air Quality Plan that will be published in July 2017 and not the existing 2015 Air Quality Plan which was ruled by the High Court to be over optimistic with regards to its emissions modelling even without the increase of additional capacity in the South East. The baseline air quality modelling must ensure that the latest real world Emissions Factor Toolkits are used and also allows for level of uncertainty within the modelling process which is quantified.

5.0 HOW WELL THE PROPOSAL TAKES ACCOUNT OF OTHER ASPECTS OF THE GOVERNMENTS TRANSPORT STRATEGY

5.1 *Airport expansion needs to adhere to the principles of sustainable development and minimise the environmental impacts of all forms of transport as far as possible. Whilst the roles of public transport, walking and cycling has been acknowledged, we are concerned that the negative impacts of goods vehicles has not been recognised. Currently such vehicles are diesel powered and are larger in size causing greater noise, emissions and congestion impacts unless effectively mitigated. There is a lack of a joined-up national transport strategy.*

5.2 This is further exemplified by the paradoxical treatment of HS2. For example, we are concerned that the draft Airports NPS identifies a need for additional domestic flights considering the impact of the effect of proposals for HS2 (and beyond) to change and remove the need for domestic flights. Furthermore, we would like to see a further maximisation of the connectivity opportunities between Heathrow and HS2 (see section 9.0 below for further detail).

6.0 HOW COMPREHENSIVE THE PROPOSAL IS IN TERMS OF THE SUPPORTING MEASURES FOR AFFECTED COMMUNITIES

6.1 *The NPS addresses direct impacts on individual receptors nearest the airport runway thresholds (such a noise and air quality) and upon various land use planning aspects within the 'redline ' of any DCO that are important to local communities,*

including protection of the historic environment, use of sites in the Green belt or land with other scarce resources. But it is inadequate in its consideration on the wider impact of the communities represented by the members of the HSPG. The Group intend to prepare a joint planning framework, to inform their local impact reports and guide the determination of any DCO, and to ensure any expansion is strategically and sustainably planned across the sub-region over the coming next decades and Local Plan cycles.

- 6.2 Commercial aviation has developed in ways not foreseen 70 years ago when the airport opened and the existing airport and its relationship in the towns and suburbs of the western approaches to central London have evolved rather than been strategically planned. We believe that we now have, what is literally a ‘once in a life time opportunity’ – a once in 70 years opportunity - to re-invent a range of physical, economic, social and environmental relationships and ensure the expansion of the airport is in a form fit for the next 60³ to 70 years. A clear purpose of the Airports NPS should be to set out policy to require that planning for the expansion of the airport is aligned with that of the surrounding sub-region; this is essential to ensure the sustainable development of the airport to meet its full potential and the sustainable future of the surrounding communities in area represented by the authorities of the HSPG.
- 6.3 The NPS addresses the more direct impacts on receptor communities nearest the airport and land within the ‘redline’ boundary, and clearly the National Planning Policy Framework will be applicable to any decision. But whereas paragraph 4.4 sets out that wider and long term benefits and adverse impacts should be weighed by the decision maker, the draft Airports NPS fails to adequately address the full impact of an airport operating to the full parameters stated or to recognise the sub-regional scale spatial planning considerations needed to address the full scale of impacts and benefits of the airport expansion is likely to have, on for example housing and employment land and travel demand. This will reach out across a wider area administered by many local planning authorities and straddling the Greater London Authority boundary. The HSPG believe it is critically important for a sub-regional scale of continuing collaboration to be established to set out a joint spatial planning framework for the area to ensure that Local Plans (and the London Plan) are properly aligned with the determined airport expansion – in a two way relationship.
- 6.4 This wider consideration is essential to properly assess the range of benefits and impacts in the surrounding communities most directly impacted and to maximise the direct, indirect and kinetic benefits and harmful impacts of airport expansion. A strategic approach can ensure greater effectiveness and efficiency is achieved in compensatory measures. The HSPG intend that the preparation of this joint spatial planning framework would also assist in the ‘host’ and other authorities to jointly prepare their local impact report(s) – as required by s.104 of the Planning Act 2008 – for consideration by the decision maker.
- 6.5 Therefore the HSPG believe the NPS should clearly set out that a strategic approach is required to properly consider and plan for the wider areas of impact over time as the airport is developed to reach its optimal capacity. This area could extend to the (future) one-hour employee commuting distance; to approximate the ‘functional economic area’ around Heathrow Airport in which the impact on employment land and housing land demand will need to ‘objectively assessed’ in accordance with the National Planning Policy Framework and Local Plan making guidance. The preparation of the framework will assist the local planning authorities in preparing a joint local impact report(s) in response to any DCO. The HSPG believe that the NPS should clearly state that this framework should be considered by the decision makers assessing the DCO.

³ Para 4.43 refers to a 60year design life

- 6.6 The draft Airports NPS clearly states that it only applies to schemes at Heathrow Airport that are shown within the scheme boundary map. However point 4.11 states: 'this does not limit variations resulting in the final scheme for which development consent is sought'.
- 6.7 Whilst we acknowledge this, the Group believe that the applicant needs to consider development that will exist outside of the red line boundary but will support or benefit the scheme proposal in the long term. This will enable the Group to consider the impact of the development in terms of spatial planning (i.e. what is required and what can be accommodated where with regards to spatial planning so that all communities benefit from sustainable regeneration) as well as what planning guidance, rules and regulations will be used to approve them.
- 6.8 Furthermore, if final scheme variations are possible then the airport operator needs to clarify from the outset to local communities what the scope of these variations are as soon as possible so that they can understand the potential impacts and options.
- 6.9 Throughout the draft Airports NPS it is clear that the responsibility is on the applicant to put forward how best to mitigate the impact of the development on neighbouring boroughs and their communities. For example with regards to the noise envelope, the proposal states that the operational arrangements including runway 'alternation' should be designed by the applicant in consultation with communities. The Group believes that the NPS must set some clear parameters with regards to what this design should look like. For example the envelope should feature the use of noise performance targets compromising of the shorter time averaging periods that are capable of assessing significant community annoyance more effectively. It is vital that this relationship could be overseen and arbitrated by the proposed Independent Commission on Civil Aviation Noise, whose remit should extend right down to the runway threshold, and for the long term.
- 6.10 The Group believe that the Airports NPS should be clearer in its strategy to steer the applicant to impose a compulsory ban on night flights as opposed to it being a voluntary ban.
- 6.11 The Group welcomes the formation of the Independent Commission on Civil Aviation Noise and understand that the structure of this commission is being discussed and proposed in the draft Airspace and Noise Policy Consultation that has been issued alongside the draft Airports NPS consultation. The Group believe that the Commission can be best utilised to:
- Enforce restrictions that will enable local authorities to deliver their public health and wellbeing commitments
 - Impose appropriate conditions on the developer and
 - Put in place the mechanisms to monitor and enforce set limits leading to such sanctions being imposed to prevent any breaches.
- 6.12 The HSPG believe the remit should be clearly stated to address flight paths down to the runway and operation of the airport so that matters such as runway 'alternation', to offer periods of predictable respite to communities, and night flight bans are included within the remit.
- 6.13 The HSPG is intending to establish a joint spatial planning framework for the sub region that will assist in the alignment of local development plan strategies and infrastructure planning in response to the Governments decision on airport expansion. The Group will be making representations to any DCLG Select Committee and Environmental Audit Committee. The Group will also be engaging with DCLG in relation to preparing joint spatial planning strategies.

7.0 HOW WELL THE PROPOSAL TAKES ACCOUNT OF SUSTAINABILITY AND ENVIRONMENTAL CONSIDERATIONS AND THE ADEQUACY OF RELEVANT DOCUMENTATION AND INFORMATION PUBLISHED ALONGSIDE THE DRAFT PROPOSAL

7.1 *The Group believe that the draft Airports NPS could be strengthened in its ability to take account of sustainability and environmental considerations that the applicant needs to address. Furthermore there are aspects of the relevant documentation and information that has been published alongside the draft proposal that requires further investigation and analysis if it is to be used by the Secretary of State as part of its assessment of the Development Consent Order application submitted by the applicant.*

7.2 In the first instance, the Group accepts that its members have an obligation to deliver on their statutory requirements such as air quality. However, we believe that expansion of Heathrow will place an additional burden on councils to continue to deliver their obligations especially if it creates additional work as a result of the development. The proposal needs to identify and/or create a mechanism whereby long term monitoring and compliance with targets associated with environmental objectives such as noise, air quality, and surface access and management of green spaces is funded by the applicant and does not place an additional burden on neighbouring local authorities across the sub region in the long term. An assessment of additional burden will be necessary when the mechanisms are clearer.

7.3 The future flight paths associated with the Heathrow North West Runway and any respite measures are not yet known as in how they will work in practice. Though we accept that the scheme developer and the Airports Commission has proposed indicative plans. However the Group believes that there will be communities that will be overflowed for the first time and at this stage they should be given the opportunity to have an understanding now on how they will be affected so that they have the opportunity to comment and advise the applicant on mitigation and compensation that is being proposed. From a spatial planning perspective, local authorities are developing Local Plans and identifying sites (turning to previously rejected sites in the drive to find more urban housing) for allocation for particular development now which once the runway is built may not be suitable or additional mitigation will need to be factored in by the applicant to address the number of people who will be newly affected by noise.

7.4 For example, with regards to air quality, any DCO proposal would need to ensure compliance with the 2015 national Air Quality Plan, which is required to be modified by government by July 2017 because of UK failure to comply with the current restrictions imposed on them. Taking this into consideration we believe that the draft Airports NPS is not robust enough when it says “Government wishes the number of journeys made to airports by sustainable modes of transport to be maximised **as much as possible**”. In order for the NPS to demonstrate credibility, it should state that it would “consider measures that should ensure compliance and safeguard health and quality of life”, rather than day “minimise congestion”.

7.5 Section 5.32 states that air quality of all pollutants should be assessed in accordance with Air Quality Regulations 2010, considering any significant effects, their mitigation and residual effects, those related to runway construction and operation. However, the Group would like the NPS to specify the significance criteria, methodology, or the monitoring points.

7.6 The applicant’s assessment of future air quality projections through modelling or otherwise must be verified against measured data, as opposed to Defra background maps because there are considerable variations between these two data sets. In order to do this, the applicant must establish suitable monitoring locations near sensitive receptors (at the

airport operators expense), in order to establish a current and a true baseline. Here, both local communities and LA should be consulted as a way forward.

- 7.7 Proposed mitigation measures not only need to satisfy the Secretary of State but also ensure that measures proposed would be sufficient to ensure compliance with air quality standards and as a result we believe that the air pollutants need to be monitored and assessed on the surrounding local and strategic road network and not just within the red line boundary.
- 7.8 Across the sub region, there are a number of designated Air Quality Management Areas and air quality hot spots that border the airport as well as on the local and strategic road network. The Group believes that the applicant's assessment must include the cumulative impact on existing exceedances and likelihood of new/additional exceedances of the air quality objective limits and propose suitable mitigation measures.
- 7.9 There is reference within the NPS for the applicant to 'improve access to nature trails and public rights of way'. Whilst this is likely to focus on the Colne Valley, the Group believes a wider sub regional green and blue infrastructure strategy needs to be developed by the applicant in consultation with our Members and local communities to ensure the importance of the green and blue infrastructure is captured and mitigated as required.
- 7.10 Finally, we would like a clear assurance that any expansion of intensification of RAF Northolt will be ruled out as such a development would only result in even greater environmental problems over an even wider area.

8.0 THE EXTENT TO WHICH THE NPS PROVIDES THE SECRETARY OF STATE WITH THE BASIS FOR JUDGING APPLICATIONS FOR DEVELOPMENT

- 8.1 ***The Group believe that as it stands, the NPS merely provides instructions on what it considers the applicant should address or will be required to do. In order for the Secretary of State to be in a position to judge the applications for development, the NPS needs to clearly clarify the requirements, the targets and the sanctions that will be in place should the applicant fail to deliver on the requirements that are agreed as part of the development.***
- 8.2 The Airports NPS should more clearly require that the promoter of the DCO has or will address the full impacts and requirements of accommodating the Air Traffic Movement and other criteria approved, reaching beyond the measures in the DCO redline boundary. For example the necessary surface transport infrastructure that needs to be implemented to achieve the high level targets given, the necessary expansion of hotels, offices, logistics space, catering, car parking etc. We believe that a commitment to (over the 15 years or more of gradual expansion of capacity) the full range of necessary development is required in order to address the need.

9.0 HOW WELL THE PROPOSAL ADDRESSES CHANGES TO SURFACE ACCESS

- 9.1 ***The Group believe that at present the draft Airports NPS does not properly address the changes that would need to be taken into consideration and implemented in order to address the surface access issues. It is the Group's view that significant surface level public transport improvements are needed to serve the existing (and smaller scale expansion of a) two-runway airport – including the Western Rail Access and Southern Rail Access – as endorsed by the Airports Commission.***
- 9.2 We are concerned there is also no comprehensive assessment of the infrastructure requirements of an expanded Heathrow Airport, including an outline of the costs, the

responsibilities and the overall accountability. We believe that there is a need for significant additional transport investment over and above Heathrow Airport's immediate needs (i.e. two runway airport) in order to deliver the potential promised by expansion to genuinely enhance the national economy and to meet the targets outlined in the draft proposal i.e. as a three runway airport. The Group suggests that there should be a fully integrated approach to improving strategic infrastructure including:

- Rail links to provide southern and western rail access to the airport including from both the London Waterloo and Paddington lines as well as directly into North Surrey.
- Enhancements in access to central London from the Piccadilly and Crossrail Lines, go beyond the current upgrades and which were only built to cater for a two runway airport
- Maximising connectivity opportunities between Heathrow and HS2.

9.3 Firstly, we suggest that the National Infrastructure Commission is the appropriate body to develop a framework for delivering a surface access strategy including consideration of the complex interfaces between all the schemes, runway construction, the most appropriate timing for surface access works, phasing and growth as well as responsibilities and funding.

9.4 Secondly, the draft Airports NPS makes it clear that the Western and Southern rail access schemes are not currently considered an essential part of mitigating transport access to the proposed scheme. The Airports Commission's Report clearly concluded that both schemes are essential for the operation of a two-runway airport as well as an expanded airport, considering their importance as key links to the south west as well as to Waterloo and South London and in delivering the committed targets to achieve public transport mode share and air quality. Therefore we are extremely disappointed that within the draft Airports NPS and the supporting work published by the government that they are only considered to be 'desirable'. The case for a Western and Southern rail access has been more than clearly made on the needs of a two-runway airport. This view was endorsed by the Airports Commission (see Final Report, para 8.15, p 155). The Western Rail link is also included in the National Infrastructure Delivery Plan 2016-217 (para 5.8, page 41) under the heading "Projects in Development", with the suggestion that construction might begin "early in CP6 (2019-2024)". In launching the consultation on the NPS, the Secretary of State Chris Grayling clearly stated that: *"We are also bringing forward plans to deliver western and southern rail access to the airport as quickly as possible to provide greater flexibility, accessibility and resilience for passengers"* (Hansard Vol 620, 2 February 20178). Whilst we acknowledge that timeline may change we are of the view that the scheme should be included within the draft Airports NPS as essential and there development and implementation should not be delayed.

9.5 We also note that 'If' they are to come forward they would be subject to their own DCO or TWAO which would be assessed in relation to other NPS documents. However, we believe these schemes must be delivered for any surface access plan accompanying the existing airport as well as an expanded airport to be plausible. The Group believes that the work undertaken by the Airports Commission underestimated the job market growth in London and as a result, existing rail infrastructure such as the Piccadilly Line and Crossrail will be far fuller with rising background traffic than has been assumed. Without 'new' capacity we question both the achievability of modal shift from highway, the absolute space on public transport to accommodate that shift and consequently the likelihood of achieving air quality targets. Critically, as any surface transport system approaches overloading then unreliability increases; the resilience of the airport to operate successfully through such interruptions on any one link will also be increased with these further links.

9.6 From the documentation, it is apparent that Heathrow Airport Limited is expected to 'contribute' to the funding of these schemes, estimated as up to £2.5bn, in line with the extent to which they benefit. The Group strongly believe that the delivery of these schemes (Southern and Western rail access) is essential for the ongoing operation of the airport and that the costs should be met, in part, from the aviation industry. Whilst schemes such as

Crossrail and Piccadilly line upgrade (and highway improvements to M25 etc.) mentioned in the NPS clearly do have beneficiaries along the full length of their route and therefore not just airport users, re-routing existing trains and creating a dedicated terminus for trains from Reading and Waterloo respectively at T5 must be almost overwhelmingly of benefit to the airport as well as the relatively small number of transfer passengers using the airport as an interchange. Because overall this will assist the applicant in meeting the targets for public transport mode share of 50% by 2030 and 55% by 2040 as outlined in section 5.16 (page 46) of the proposal.

9.7 The draft Airports NPS makes reference to explicit targets for passenger and staff modal split. The Group requires clarity on whether the 'no more traffic' pledge is set against a scenario based on today, or a 2030 scenario of a completely full 2 runway airport as used by the Airports Commission. We note that City Airport has 60% modal share for non-car traffic movements and question why the targets for Heathrow have been set so low?

9.8 More importantly, there is no clarity to the definition of the 'airport' to which these apply (to the 'redline' area only, to the whole airport perimeter fence, or the wider 'airport campus' of directly related airport uses). There appears to be little reference on how the airport will be obligated to achieve these targets proposed in the NPS and how this may work in practice other than they 'should be held to account'. We believe that these targets must be binding and failure to achieve them must result in some form of sanctions that will reduce the intensity of activity at the airport. Again we note that there is little or no reference to buses as a solution/mitigation which is disappointing as they will have a key role to play in achieving the target the public transport mode share targets. We are also concerned that the draft Airports NPS does not recognise the severity of existing congestion problems on the surrounding road and public transport networks at the current time let alone with an expanded Heathrow airport. We note that the Airports Commission recommends that *'A congestion or access charge for motor vehicles should also be considered'* and would like a commitment to investigate this and to be included in the draft NPS. This is in order to control congestion and emissions from vehicles.

9.9 Furthermore, with the proposed doubling of freight capacity and the subsequent impact this will have on traffic on both the local and strategic network particularly across the sub region, we are disappointed to note that the NPS suggests that freight traffic is not included in the 'no more traffic' pledge and no target has been identified for freight. The Group seeks clarity on whether freight is included in the 'no more traffic' pledge and this should be provided as part of the NPS framework. The extent to which inevitable second order impacts arising from an expanded operation at Heathrow should be taken into account as part of the DCO is also needed. HAL may say that any off-airport growth can be assessed through the planning process on its own merits (with its own transport assessment etc.) but clearly there should be some account for what this may mean at aggregate level across the network through the DCO process - particularly if we are counting the benefit of that wider growth in employment and economic activity that help make the case for expansion.

10.0 THE EFFECTIVENESS OF THE GOVERNMENTS CONSULTATION ON THE PROPOSAL

10.1 Following the Airports Commission recommendation to increase airport capacity in the south east by taking forward the Heathrow Northwest Runway Scheme. The government undertook further work to support their decision. However the Group is disappointed that the government failed to consult with local communities on the further work that they commissioned.

10.2 The Group are concerned that not all communities situated across the sub region, that are impacted or could potentially be affected have not been given the opportunity to attend a consultation event in their local area. At this stage whatever assumption has been made by

the government, no one knows exactly what the effects of the planned expansion at Heathrow will be. We would question whether the criteria for an effective and inclusive consultation has been met if all communities are not given an equal opportunity to comment.

11.0 CONCLUSION

11.1 The Group trusts that the Committee will find this contribution to the Inquiry helpful. We would be delighted to supply a witness for one of the Committee's oral evidence sessions or to welcome the Committee Members to our sub-regional meetings and the area in order to demonstrate our position on airport expansion and impact this has on our communities, businesses and road network.

-ENDS-



Heathrow Strategic Planning Group

Terms of Reference

Adopted 11th December 2015, and amended 14th June 2016 and 21st February 2017

1.0 Introduction

Heathrow airport is a key economic driver for West London and the M3/M4 Corridor. Although the operational airport is located entirely within the LB Hillingdon, it together with the supporting uses and infrastructure has a significant impact across the sub region spatially, socially, economically and environmentally. Regardless of the outcome of the Government's final decision on Airports National Policy Statement it is recognised that the impact of the airport cuts across administrative boundaries and that the collaborative working of Local Authorities and other bodies surrounding Heathrow Airport will result in better spatial planning and the management of impacts, together with maximising the benefits of the airport to the local economy and community whatever decisions are made regarding growth in the future. The Group is therefore being formed in response to the nature of the location straddling a number of different administrative boundaries which lack any formal mechanism for strategic or 'sub regional' planning and governance other than the Duty to Cooperate.

The scope of the issues to be addressed by the Group will principally relate to land-use planning but through which it will address transportation, infrastructure, regeneration, economic development and environmental matters. This scope would be reviewed as appropriate. It is recognised that each member of the Group will have their own individual policy positions on a third runway, and membership of the Group does not require any particular position of support or opposition. It will be for each member of the working Group to decide their level of involvement. However, as an overarching principle the Group will work together to maximise the benefits and opportunities the airport brings to the area, whilst minimising its impacts.

2.0 Purpose and scope of the working

The purpose of the Group is to:

- work collaboratively in creating and delivering a vision for the Heathrow sub-region;
- enable more coordinated and consistent planning for and management of the local and sub-regional benefits and impacts of the airport through strategy and policy formulation;
- share information and expertise and collaborate where appropriate; and

- build partnership, lobby and be a collective voice on matters of sub-regional planning.

The intention of the Group is that it is essentially strategic but practical and its precise role and ways of working will evolve and change to best respond to the decisions of Government, Heathrow Airport Limited and events. However, initiatives and projects arising from the spatial relationship of local authorities with Heathrow, but not necessarily predicated on the outcome of the decision of the third runway, would still benefit from wider sub regional engagement. Heathrow is currently preparing to work up a Development Consent Order for expanding the airport and this would be facilitated by engaging with the Group in a transparent and open manner.

Initially the Group will facilitate officer level discussions, however, this may be broadened to include Councillors at a future point as appropriate.

3.0 Specific Objectives and Outputs of the Group

The work of the Group will have three specific objectives:

- For planning authorities own plan making, the Group will assist essential Duty to Cooperate processes and assist in the adoption of a common range of scenarios for testing and consideration that will make all Local Plan (and London spatial development strategy) examinations more straight forward and robust.
- For (any) Development Consent Order prepared by Heathrow Airport Limited, the Group will enable early and effective engagement in the evolution of consultation proposals, design options, scoping of evidence requirements, design of the key studies, and the sharing of the results etc.
- To provide a collective point of communication with Government on issues of common concern around the processes, resources, wider infrastructure and other implications of growth at Heathrow Airport upon the sub-region.

The Outputs from the Group could include:

- a. A common Statement setting out the key common points and /or range of differences.
- b. Broad identification of the essential infrastructure needed to enable growth and change. This may extend beyond Heathrow expansion and related early enabling works to take into account other major schemes and developments in the sub-region.

- c. Common positions of how much and what type of development and employment is and will be needed, when and where, across the sub region, and the starting point in guiding the location of this.
- d. Work towards developing a common vision and strategy statement for the sub-region – a positive ‘branding’.
- e. Capturing these ideas and representing them through a draft sub-regional plan for the Heathrow area.
- f. A common guide and reference point to the different planning ‘rules’ and methodologies that apply inside and outside of London and different counties. This will help guide/explain/reconcile a common understanding and data sets.

4.0 The Working Group in practice

The Group will meet regularly at a frequency to be agreed. It is anticipated that this would be monthly during the initial period awaiting the Government’s initial decision.

Sub-Groups may be established to focus on specific work areas, and their work coordinated by the working Group including:

- Spatial planning – housing and employment floor space need and demand
- Transport – strategic change
- Environment – the whole range of impacts, mitigation and improvements
- Economic development – the impact the airport has on the local economy, employment, training and supply chain

In November 2016 a Summit Meeting was held with Council and organisation leaderships in attendance. It was agreed that a meeting of organisation Leaders will be convened by the Leader of Hounslow Council at appropriate intervals, and that further summit meetings will be held at key stages in the work programme.

The working Group meeting will be chaired by the Director of Strategic Planning, Economic Development and Regeneration London Borough of Hounslow. LB Hounslow officers will service the ‘parent’ Group meeting, organising a room, providing an agenda and a list of actions/short minutes from each meeting, with an update at the following meeting. Members will financially assist LB Hounslow to share the cost of this work.

Meeting notes and email correspondence will all be produced in a form suitable for publication if required.

Sub-Groups will be chaired and serviced by willing participants as appropriate.

5.0 Membership

Initially the membership of the Group is open to those authorities and bodies as set out below who have been identified by the Group as having a key stake in sub-regional planning and if they engage will commit to resourcing with suitably authoritative Officer Representative:

- London Borough Hounslow
- London Borough Hillingdon (invited to attend but currently not participating)
- London Borough Ealing
- Spelthorne Borough Council
- Runnymede Borough Council
- South Bucks District Council
- Royal Borough of Windsor and Maidenhead
- Slough Borough Council
- Thames Valley Berkshire Local Enterprise Partnership
- Buckinghamshire Thames Valley Local Enterprise Partnership
- Enterprise M3 Local Enterprise Partnership
- Surrey County Council (in respect of strategic transport and other relevant functions)
- Bucks County Council (in respect of strategic transport and other relevant functions)
- London LEP (to be invited but currently not participating)
- Greater London Authority (Observer status only)
- Transport for London (Observer status only)
- Government (coordinating representative from DCLG/BEIS) (Observer status only)
- Government (DfT Aviation Policy) (Observer status only)
- Highways England (Observer status only)
- Old Oak and Park Royal Development Commission (OPDC) (Observer status only)
- West London Alliance (Observer status only)
- Colne Valley Park (Observer status only)

Other parties and in particular other transport bodies or organisations will be invited to join (the 'parent' Group or sub-Groups) as appropriate taking into account the scope of the issues being considered.

Heathrow Airport Limited

HAL are no longer a member of the Group but the Group will continue to work positively with HAL to achieve common objectives. Representatives of HAL will continue to be invited to participate in meetings and share information with Observer status.

Interim update of the Terms of Reference

This is an interim update of the ToR to reflect new relationship with HAL, Government decision and new participants; this is urgently needed to explain the purpose and role of the Group as we increase public profile. A fuller review maybe required to enable signing of any Planning Performance Agreement or changes in Governance.

-ENDS-