



The Draft London Plan
December 2017

Written response submitted by
Heathrow Airport Limited

2 March 2017

Executive Summary

- 1.1 Heathrow Airport is pleased to have the opportunity to comment on the Mayor of London's draft London Plan. Our comments should be read alongside our responses to the Mayor's consultations on the draft Transport Strategy and draft Environment Strategy.
- 1.2 Since 1946, Heathrow has been connecting people from around the globe, making it one of the world's busiest international airports. In 2017, approximately 78 million passengers passed through the airport. Heathrow is the UK's hub airport and London's global gateway to the rest of world. It is a driver of jobs and growth locally and nationally. But it is full, and London and the UK are losing out as other European hubs deliver the growth and jobs that their countries need to compete in the global economy.
- 1.3 Our plans for expansion will enable London to remain a world class city in a post-Brexit world. Expansion will deliver benefits across the UK, and is a key strategic element of the Government's modern industrial strategy. Expansion, will ensure that London retains its competitive edge and attractiveness as a destination for commerce and investment.
- 1.4 We broadly welcome the Mayor's draft London Plan and in particular its objectives for infrastructure, employment and skills. Heathrow's expansion offers significant opportunities to deliver against the Mayor's objectives for a number of his opportunity areas and more broadly for West London's spatial growth. There is much in the London Plan that supports both our own commitments and the Government's policy requirements for expansion. However, there are a number of areas we believe could be reviewed in light of this response, and in the context of the emerging Airports National Policy Statement (NPS).
- 1.5 It is important that the London Plan recognises the Government's clear position on the need for Heathrow's expansion and the principal policy requirements set out in the emerging NPS. The policies in the London plan should be consistent with the policies in the NPS in the interests of both Greater London and areas outside of it. A published London Plan should not set competing or different policy tests. We are confident that expansion can be delivered against the requirements set out in the emerging NPS whilst supporting the Mayor's vision for London.
- 1.6 Delivering Heathrow's expansion successfully by maximising the benefits and opportunities, minimising the impacts and securing the best outcomes for the local area, London and the UK will require a concerted partnership approach. We are already engaging with neighbouring boroughs, LEPs, statutory bodies and other stakeholders in planning for Heathrow's expansion, including within the context of the Heathrow sub-region. We would welcome the opportunity for ongoing engagement with the GLA and TfL.
- 1.7 We are currently in the early stages of the pre-application process for Heathrow expansion, and if the Airports NPS is designated in we expect to submit our application for development consent in subsequently. Engagement and consultation with our local communities and stakeholders, including the GLA and TfL, is an important part of our pre-application activities. We wish to continue to engage constructively with all of our stakeholders as we develop our proposals for Expansion.

2. Chapter 2 - Growth Corridors & Opportunity Areas

Policy SD1 Opportunity Areas

- 2.1 We welcome the London Plan's approach to Opportunity Areas in delivering a significant amount of London's new homes and jobs and the recognition that infrastructure and transport investment, as well as partnership working, is key to achieving this. It is right to acknowledge that London's growth corridors have links beyond London and that collaboration with Wider South-East partners will help to secure mutual benefits. Opportunity Area Planning Frameworks and Local Plans (within London) will need to look beyond these boundaries and take account of wider infrastructure and economic factors in properly planning for growth.
- 2.2 We support Policy SD 1 and the goals it sets in supporting and leading on the preparation and implementation of planning frameworks for London's Opportunity Areas. The obligations on the Boroughs to play their part in planning for and delivering the necessary infrastructure to support and sustain growth in these areas are also important. We acknowledge the role of the Mayor's Transport Strategy also in supporting growth in the Opportunity Areas through transport investment and planning, and we welcome the commitment to ambitious mode share targets.

Heathrow/Elizabeth Line West Opportunity Area

- 2.3 We welcome the proposal to deliver 11,000 new jobs in the Heathrow/Elizabeth Line West Opportunity Area. Heathrow's economic influence in the Opportunity Area will continue to be a catalyst for delivering employment opportunities, but expansion could see up to 40,000 new jobs in the local area¹. This could see the Opportunity Area realise a much higher level of growth ambition for London and the Heathrow sub-region.
- 2.4 We address the Mayor's position on expansion under Policy T8 later in this response. The Mayors' position on clarifying the growth potential of the Opportunity Area once Heathrow's expansion proposals are clearer is likely to have the effect of further delaying any progress on developing a planning framework for the Heathrow Opportunity Area.
- 2.5 As we move closer to a decision point regarding the NPS, we encourage the GLA and TfL to acknowledge and support the work that is being progressed by a number of the local and county authorities, and LEPs, in and beyond London (known as the Heathrow Strategic Planning Group) in considering and planning for Heathrow's expansion. This work goes significantly beyond the high level considerations set out in this chapter of the draft Plan. Studies are now underway to consider the implications of expansion on the sub-region and its future housing, economic and infrastructure requirements with a view to potentially preparing a joint spatial planning framework to guide spatial strategies and strategic development in the long-term across the Heathrow sub-region.
- 2.6 Boroughs around Heathrow are already acknowledging the work of the HSPG in their emerging Local Plans and in some cases actively planning for the airport's growth.
- 2.7 In accordance with proposed Policy SD1, we would encourage the GLA and TfL, as the strategic planning and transport authorities for London, to engage constructively with the Heathrow Strategic Planning Group (HSPG) as its work progresses. This is particularly crucial given that

¹ <https://www.heathrowexpansion.com/local-community/local-benefits/>

Heathrow's expansion will be key to achieving the London Plan's growth objectives for the Opportunity Area.

Policy SD2 Collaboration in the Wider South East

- 2.8 We are supportive of proposed Policy SD2 and its requirement for the Mayor to work with partners across the wider South East to address regional and sub-regional challenges and opportunities. The supporting text to the policy highlights the need for cooperation between the Mayor, boroughs and local authorities bordering London to ensure important strategic issues are planned effectively.
- 2.9 Even without expansion Heathrow remains a matter of strategic and national importance for many authorities and organisations across London and the wider South East. It will continue to be a major driver of the West London economy and a contributor of jobs and growth across the UK, as well as a major multi-modal transport interchange. As set out above, these authorities are already collaborating under the Duty to Co-Operate to consider the future of the sub-region and established a vision for the area early in 2016. We would encourage the GLA and TfL in accordance with the wording and aspirations of emerging policy SD2, to engage with the HSPG in its strategic planning for the Heathrow sub-region, and we would welcome their participation in this forum.

3. Chapter 3 - Design

Policy D12 Agent of Change

- 3.1 We support the proposed policy which places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. This is a fair and pragmatic approach that we would strongly support in the context of new noise-sensitive development in the vicinity of Heathrow where noise from aircraft both in the air and on the ground is particularly prevalent. This is consistent with the International Civil Aviation Organisation (ICAO) 'Balanced Approach' in terms of how land use planning can be used to appropriately mitigate against noise.
- 3.2 It is important the new noise-sensitive development likely to be affected by relevant levels of aircraft noise is constructed and insulated to appropriate standards prior to occupation. Boroughs should reflect this approach in their local plans.

Policy D13 Noise

- 3.3 The reference in the policy to "other non-aviation development proposals" is unclear. We would query whether this should more appropriately refer to "residential and other noise-sensitive development proposals" since the principal purpose of the policy appears to be aimed at the management of noise in respect of noise sensitive development.

4. Chapter 6 - Economy

Policy E1 Offices

- 4.1 Heathrow's presence has positively influenced the locational decisions of many of the international headquarters that have clustered within the Thames Valley and west London sub-regions. With expansion, this trend is likely to continue, and there will be increased demand for smaller airport-related office development closer to the airport.
- 4.2 Whilst proposed Policy E1 makes reference to urban business parks at Stockley Park and Bedfont Lakes, both very close to Heathrow the policy does not recognise the particular draw that major public transport interchanges like Heathrow have on attracting a variety of new office development, particularly if the airport is to be expanded. Moreover, such locations offer a very sustainable alternative to the traditional office locations referenced in proposed Policy E1, whether they are likely to attract occupiers seeking good access and close proximity to Heathrow's unrivalled internal connections or are seeking to benefit from the airport supply chain opportunities.
- 4.3 We are already working closely with the HSPG to understanding the employment development requirements from an expanded airport and set out demand forecasts for a variety of airport related development and uses in our current public consultation on our expansion proposals.
- 4.4 Irrespective of expansion, our ambition is to continue to promote some of the land adjacent to our terminals for airport related office and hotel development, as commonly seen at other major European hub airports. Heathrow's current and improving public transport accessibility, taking into account planned and committed rail enhancements, will ensure the airport and the surrounding area remain an attractive location for office and employment related development.
- 4.5 For the reasons given above we consider that Policy E1 should recognise Heathrow, and indeed other major transport interchanges, as potential locations for office development.

Policy E11 Skills and opportunities for all

- 4.6 Heathrow welcomes the commitment of the London Plan to providing skills and opportunities for all Londoners and stands ready to support the Mayor and his Skills for Londoners Taskforce wherever possible.
- 4.7 Heathrow is one of the largest single-site employers in the country, with over 76,000 people directly employed on-site. Our apprenticeship programme provides great career opportunities and demonstrates the value of vocational training. Investing in young people is already a core part of Heathrow's business with initiatives such as the Heathrow Academy and the Skills Taskforce. Today, more than half of the airport's engineering workforce come from Heathrow's own apprenticeship scheme.
- 4.8 With expansion, we are further enhancing our existing training and apprenticeship programmes, ensuring the benefits of a third runway are felt as widely as possible. The Heathrow Skills Taskforce, chaired by Lord Blunkett, is providing advice and guidance to Heathrow on how to successfully deliver the 10,000 apprenticeships needed to run and operate an expanded airport. Delivery of these apprenticeships will largely be through its supply chain and airport business community. We would welcome further discussions with your officers to explore where our apprenticeship schemes may support GLA initiatives.

5. Chapter 8 – Green Infrastructure

Policy G2 Green Belt

- 5.1 The approach to Green Belt at Policy G2 requires that development proposals that would harm the Green belt should be refused, with no exceptions, that the extension of the Green Belt will be supported and its de-designation will be opposed, again with no exceptions. This approach is inconsistent with national policy, including the National Planning Policy Framework, which provides a degree of appropriate flexibility for local authorities to alter established Green Belt boundaries in exceptional circumstances through the preparation and review process for their Local Plans or to determine that very special circumstances exist for development proposals in the Green Belt.
- 5.2 The expansion of Heathrow Airport presents a situation where nationally significant infrastructure is supported in a Green Belt location by the independent Airports Commission and by Government through the emerging Airports NPS. .
- 5.3 Should Heathrow’s expansion proceed, there will inevitably be an impact on the Green Belt, not only for the extended airfield but also potentially for the ancillary and associated developments that are likely to be needed to support the new airport (for example, road diversions, airport related employment development, airport maintenance and support facilities). Our current public consultation on our expansion proposals considers the potential extent of land that could be required close to the airport. Much of this potential requirement is on Green Belt land.
- 5.4 It is therefore important for the London Plan to recognise that such proposals could come forward and it should mirror the national policy tests for Green Belt boundary alterations and development proposals so that London Boroughs can appropriately plan for such development in their emerging Local Plans and in the determination of any relevant planning applications.

6. Chapter 10 - Transport

Policy T3 Transport capacity, connectivity and safeguarding

- 6.1 We welcome the requirement in this proposed policy for development plans to develop transport policies and projects that not only support the sustainable development of London but look beyond this to the Wider South East and to better national and international public transport connections. Recognition that London's success is based on transport systems that connect London to the regions and to the rest of the world is important.
- 6.2 Heathrow is London and the UK's gateway to many destinations around the globe that simply cannot be served by other UK airports. It is London and the UK's most important port for both passengers and by value of non-EU cargo. Approximately 75% of all UK long-haul flights are from Heathrow. However, Heathrow's capacity is constrained and the airport has now effectively been full for over 10 years. This is constraining London and the UK's ability to sustain and improve its international connections with the rest of the world and compete with other European cities and regions. More capacity at Heathrow will create growth across the UK and secure Britain's future as an outward facing trading nation.
- 6.3 Building on and improving public transport links to the airport will ensure that more people and businesses in London and the rest of the UK have better access to Heathrow's national and international connections. It will consolidate Heathrow's role as an integrated transport hub with rail connections to the north, west, east and south and with many more opportunities for promoting sustainable travel. Planned and committed rail improvements will enable millions more people to reach the airport and treble Heathrow's rail capacity by 2040.
- 6.4 It is encouraging to see reference to both western and southern rail access in the indicative list of transport schemes that support Policy T3 but we do not consider it is accurate for Table 10.1 to state that these schemes are 'required' for expansion. It is acknowledged in rail industry planning that these two schemes are crucial in filling existing strategic gaps in the rail network and meeting the UK's needs for better rail connectivity to its ports and airports, i.e., these schemes are needed now in any event.
- 6.5 Despite excellent connections into central London, the UK's hub airport has relatively poor rail connections in other directions. HS2, via Old Oak Common, will drastically improve accessibility to the midlands and the North. The Elizabeth Line will provide more choice and capacity from London and the east while eventually reaching as far west as Maidenhead. The new Western Rail Link will bring the Thames Valley, Wales and the West that much closer to Heathrow and there is growing confidence in its delivery before a third runway opens. A feasibility study undertaken by Network Rail has shown that there is a strong business case for southern rail access to Heathrow. That scheme has wide stakeholder support and has huge potential to improve accessibility for Londoners and to the South as well as achieve wider connectivity benefits.
- 6.6 We understand that a development consent order application is likely to be submitted for the new Western Rail Link by the end of 2018 and that the service could be in operation before Heathrow's new runway opens. We encourage the London Plan to reflect this in the timescale set out in Table 10.1 that supports Policy T3.

Policy T8 Aviation

6.7 There are a number of matters raised within Policy T8 that we wish to respond to.

Need and benefits of airport capacity

6.8 We welcome the London Plan's recognition of the importance and value of aviation to London and the need for additional airport capacity in the South East. It is undisputed that London's success and competitiveness as a world city is inextricably linked to its international connectivity and the benefits this brings in terms of trade, tourism, jobs and prosperity.

6.9 Part C of proposed Policy T8 states that any airport expansion must be appropriately assessed and "*if required*" demonstrate that there is an overriding public interest or that there is no suitable alternative solution with fewer environmental impacts.

6.10 A full and thorough assessment is of course a pre-requisite to any expansion, and in Heathrow's case this has already been undertaken at the strategic level in order to inform the Government's preferred approach to expand the airport.

6.11 There is an emerging National Policy Statement (NPS) for airport expansion at Heathrow which establishes the need for the project in meeting the UK's need for additional hub capacity, and why this is the preferred and indeed only option for meeting that need.

6.12 This context should be fully set out in the London Plan to accompany Policy T8, which in light of the emerging NPS should also make it clear that in respect of Heathrow the test of overriding public interest or no suitable alternatives is not required, or this would give rise to an inconsistency with national policy.

6.13 For the same reasons, the supporting text at paragraph 10.8.7 of the Plan, setting out the Mayor's belief that Gatwick could deliver quicker benefits, at less cost and with less impacts is inappropriate in a spatial planning policy document and should be removed.

Role of Opportunity Areas

6.14 We also support the recognition of the role that airports can play in supporting London's spatial growth, particularly within opportunity areas. Heathrow airport sits at the heart of the Elizabeth Line West/Heathrow Opportunity Area where there is significant potential for new employment development and jobs. Heathrow's expansion would of course make a significant contribution to generating new jobs, many of which will be taken by residents in the boroughs surrounding the airport.

6.15 Heathrow is already working with neighbouring boroughs and LEAs, within and beyond London to understand the spatial implications of airport expansion on housing, employment development and infrastructure, whilst recognising the significant opportunities that could be realised closer to the airport in planning for new airport related development. Again, we would encourage the Mayor's teams to be more integrated into this wider cross-boundary spatial planning given the potential it has to meet the Mayor's objectives for spatial growth.

6.16 Moreover, Heathrow's expansion is likely to have a significant influence on the success of the Old Oak and Park Royal Opportunity Area and the 65,000 jobs this needs to deliver. With the UK's hub airport within an approximately 10 minute rail journey, the Opportunity Area could have a key role to play in accommodating some of the demand for new airport related development

as well as the international headquarters that will continue to agglomerate in close proximity to Heathrow. The Old Oak and Park Royal Opportunity Area Planning Framework draws on its excellent accessibility to Heathrow as one of its unique selling points as well as driving new demand for hotel uses and associated services. It specifically recognises that expansion would increase demand for commercial space in the area.

- 6.17 The potential role of Heathrow in generating jobs and growth within both of the opportunity areas should be better recognised in the Plan.

Environmental Impacts

- 6.18 We also acknowledge concerns at Part C of the policy on the environmental consequences of expansion, particularly around air quality, noise and surface access. We have always been clear that expansion cannot take place at any cost and must appropriately balance the local and national benefits against the impacts. The Government has set a range of policy requirements as prerequisites to expansion in the emerging NPS, and we have committed to meeting those requirements.

- 6.19 It is not appropriate therefore for the London Plan to propose additional and different tests which are inconsistent with national policy.

- 6.20 In this respect, Part D of the proposed policy sets out the Mayor's position to oppose expansion unless it can be shown that no additional noise or air quality harm would result, and the benefits of future regulatory and technology improvements fairly shared with affected communities. We address the approach to air quality and noise in turn below.

Air Quality

- 6.21 In respect of air quality, the NPS sets stringent air quality requirements and provides that in order to grant development consent for expansion the Secretary of State will need to be satisfied that the scheme would be compliant with legal obligations. Particular attention will need to be given to impacts within Air Quality Management Areas, roads currently identified as being above EU limit values or nature conservation sites. The policy requirement for no additional air quality harm is not consistent with the wider air quality policies in the Plan and goes beyond 'Policy SI1 Improving air quality'. Policy should be applied equitably to all proposed development within London, and the requirements of Policy SI1 do not demand that development should result in no additional harm to air quality, but rather that development proposals should minimise increased exposure to existing air pollution and make provision to address local problems of air quality.

- 6.22 We are confident in the ability of our proposals to meet the requirements of the NPS and stand by our 'triple lock' guarantee to deliver the Project in accordance with the UK's legal air quality obligations. The three elements of the triple lock are:

- meeting our existing commitment to improving air quality by not increasing the amount of airport-related vehicle traffic on the road, by supporting improved surface access that would increase the number of people (both passengers and employees) using public transport, and by encouraging and incentivising the use of new technology and cleaner vehicles;
- ensuring further measures are ready to be introduced if required to reduce road journeys, reduce emissions and support more sustainable travel patterns, including a road user charge or emission-based access charge; and

- binding our commitment by guaranteeing that new capacity at an expanded airport will only be released when it is clear that the airport's direct contribution to air quality will not delay or cause non-compliance with the UK's legal air quality obligations.

- 6.23 This commitment should provide further confidence in the conclusions of numerous assessments completed by the Airports Commission, Government and Heathrow, that expansion can be delivered without compromising the UK's ability to comply with legal air quality obligations [and without causing exceedances of the National Air Quality Objectives]², in accordance with Policy S11 of the draft Plan. Moreover, this conclusion has been reached despite previous assessments not taking full account of our available suite of mitigation measures or the Mayor's proposals to deliver air quality improvements.
- 6.24 We refute the assertion under Policy T8 at paragraph 10.8.4, that 'Hundreds of thousands of Londoners are already exposed to illegal levels of air pollution and significant noise pollution as a result of Heathrow airport's current operations and activities.' No evidence is provided to substantiate this, and we view this statement as misleading. Local air quality monitoring in the Heathrow area demonstrates that air quality within the locality of the airport meets the relevant legal limits. Within 2km of the airport boundary, existing concentrations of NO₂ exceed the limit value at 2 locations north of the M4, where non-airport related traffic is the key contributor to pollutant concentrations. In the immediate vicinity of the airport, however, limits on air quality are met. It has been demonstrated through numerous assessments that, with distance from the airport, the influence of associated emissions sources decreases. It is therefore inappropriate to assert that hundreds of thousands of Londoners are already exposed to illegal levels of air and significant noise pollution purely as a result of Heathrow, particularly in a spatial planning document such as the draft Plan. This section of the draft Plan should be amended accordingly.
- 6.25 We maintain a strong commitment to playing our part in helping drive air quality improvements in London and the south-east, which builds on our strong track-record of implementing effective measures to reduce emissions from activities at Heathrow. National and regional actions will play an important role in reducing pollutant concentrations across the UK in the forthcoming years.
- 6.26 We are incorporating a number of air quality positive principles within our expansion proposals, including the use of low or zero-emission heating and energy and improvements to public transport, walking and cycling infrastructure. With expansion, there is an opportunity to redesign local roads and provide additional support for sustainable transport. We have launched our first consultation on the key elements of our proposals and welcome the Mayor's views, including those on our approach to air quality.
- 6.27 As noted in our response to the Mayor's draft Environment Strategy, we are eager to work constructively with the GLA and TfL as mitigation strategies for air quality, noise and surface access are developed. This will ensure the measures brought forward are consistent with and complement the Mayor's proposals to improve local air quality within London.

Noise

- 6.28 With respect to noise, Heathrow is now quieter than it's been at any time since the 1970s, but we are still looking to do more to make the skies around Heathrow quieter for everyone.

² Jacobs (2015) Module 6: Air Quality Local Assessment - Detailed Emissions Inventory and Dispersion Modelling. Prepared for the Airports Commission
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/426241/air-quality-local-assessment-report.pdf.

- 6.29 The emerging NPS contains clear requirements in relation to the effective management and control of noise from an expanded Heathrow. We are proposing a continuation of our existing approach in the context of the requirements of the emerging NPS and the ICAO Balanced Approach and with the benefit of extensive consultation with local communities and other stakeholders.
- 6.30 We have consistently demonstrated that an expanded Heathrow does not necessarily mean more people exposed to noise. Our assessment work has shown that the number of people exposed to levels of noise at a range of relevant thresholds can be lower with a third runway than it has been in recent years. We remain committed to working to this principle.
- 6.31 Our proposals can be designed to decrease the total number of people affected by noise compared with today, allow operations management to provide residents with regular and predictable periods of respite and expand the scheduled night time ban to 6.5 hours. As well as minimising the residential areas newly overflowed, additional mitigation will be provided by a comprehensive sound insulation scheme, and a broad and generous property purchase programme.
- 6.32 We refer again to the claim in the draft Plan that hundreds of thousands of Londoners are already exposed to significant noise pollution. Quoting the number of people affected by aircraft noise from Heathrow implies that all of those residents are highly annoyed. In reality, that will not be the case. Noise is a subjective issue and people react in different ways. Some people will be annoyed by noise at the lower end of the range whilst others even directly under the flightpaths close to the airport do not find this a problem.
- 6.33 Noise from aircraft is likely to be an important factor, along with noise from other transport sources such as roads and rail lines, in informing people's choices about where they want to live. Evidence shows that some 2.4m people in London are affected by road noise above 55Lden and more than half a million affected by rail noise at the same level³. This compares to just over 750,000 affected by aircraft noise.
- 6.34 The demand for housing in west London continues to grow and the number of people living close to the airport therefore continues to increase. This is despite significant reductions in the number of people affected by aircraft noise over the past few decades as a direct result of investment and innovation by Heathrow, its airlines and the aviation industry to reduce noise from aircraft and operations. For example, the number of people affected by the 55Lden noise contour fell by 9% in the 10 years to 2016, but would have fallen by 21% had it not been for additional housing growth⁴. The employment opportunities and transport connectivity offered by Heathrow and its economic hinterland contributes to making the area a popular place to live.
- 6.35 Whilst we absolutely recognise and are fully committed to reducing the noise impacts of Heathrow's operations, the statement in the draft Plan should be appropriately qualified or omitted.

³ https://www.heathrow.com/file_source/HeathrowNoise/Static/Noise_Action_Plan.pdf - p25, figures are for 2011.

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[https://www.heathrow.com/file_source/HeathrowNoise/Static/Heathrow NAP Contours 2016 and Summer Contours 2016.pdf](https://www.heathrow.com/file_source/HeathrowNoise/Static/Heathrow_NAP_Contours_2016_and_Summer_Contours_2016.pdf), p158 Table C19

Surface access

- 6.36 We note the Mayor's proposed policy in relation to surface access and his specific concerns in relation to Heathrow's expansion in terms of relying on schemes designed only to deal with background growth and the subsequent need for new infrastructure to manage this. We stand by our commitments and the requirements in the emerging NPS to play our part in growing public transport mode share whilst not increasing airport related traffic.
- 6.37 A combination of improvements to current transport services, new services and other initiatives will all help to work towards meeting the requirements in the NPS. It is unreasonable for the proposed Plan to suggest that expansion should not rely on schemes designed to cater for background growth. The new Elizabeth Line and upgraded Piccadilly Line schemes have been developed to accommodate peak period demand driven primarily by commuters travelling into and across central London. Much of the demand generated by an expanded Heathrow will occur both outside the traditional peak hours or in the opposite direction to traditional commuter travel, much as it does today. As such, these services are capable of accommodating growth from expansion.
- 6.38 Together with other committed and proposed rail schemes, which we continue to strongly support regardless of expansion, we could see a trebling of rail capacity at the airport, which would be sufficient to accommodate the additional demand generated by expansion.
- 6.39 Moreover, the additional trips generated by expansion would only represent a small proportion of the total trips on the London network. There are currently 27 million trips per day made in London. Even if all of the 135,000 additional trips forecast by TfL (from Heathrow expansion) were made on London's transport network, this would represent only a 0.5% increase in trips in a 15-20 year period. Between 2000 and 2016 there was almost 20% growth in trips across London.
- 6.40 We believe it is important to work collaboratively to ensure that any analysis of future travel demand and the impact of surface access measures with expansion are based on robust and objective assumptions. In this scenario, we do not think there need be a substantial difference in opinion between Heathrow and the Mayor in agreeing the measures necessary to achieve the requirements in the emerging NPS.

7. Summary of our representations

- 7.1 We support the Mayor's policy to work with partners across the South East to address regional challenges and issues and we urge the Mayor to engage with the HSPG in his planning for new homes and jobs in the Heathrow/Elizabeth Line West Opportunity Area;
- 7.2 We encourage the GLA and TfL to engage constructively with Heathrow and the HSPG as these efforts are fundamental to making his aspirations for the Heathrow/Elizabeth Line West Opportunity Area a reality;
- 7.3 We welcome the Mayor's transport policies and the recognition that London's success is based on its national and international connectivity;
- 7.4 The Plan should recognise the attractiveness of the airport and its surrounding area for new office development, particularly if the airport is expanded;
- 7.5 The Plan should recognise the potential impacts that expansion would have on the Green Belt and the exceptional circumstances which would justify it in this case, so as to enable Boroughs the opportunity and flexibility to plan for this;
- 7.6 The context of the Government's support for expansion at Heathrow should be objectively set out in the London plan and there should be no inconsistencies with related national policy;
- 7.7 Heathrow's expansion is likely to be inextricably linked to meeting objectives for both the Heathrow/Elizabeth Line West and Old Oak and Park Royal Opportunity Areas;
- 7.8 It is not appropriate for the draft Plan to propose policy tests for aspects of Heathrow's expansion that are inconsistent with existing and emerging Government policy requirements (e.g. on air quality);
- 7.9 We are confident that we will meet our extensive existing commitments and the NPS requirements in respect of air quality and noise; and
- 7.10 We would welcome much closer working with the GLA and TfL in delivering our surface access strategy for expansion.