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Civil Aviation Authority
Aviation House
Gatwick Airport South
West Sussex, RH6 0YR.

By email only

To whom it may concern

HSPG response to: Economic regulation of Heathrow Airport Limited: policy update and consultation on the early costs of capacity expansion

Please see below a response to this consultation by the Heathrow Strategic Planning Group (HSPG).

HSPG is a group of 14 local authorities, Local Enterprise Partnerships and the Colne Valley Regional Park CIC around Heathrow Airport. We are working together to maximise the benefits and minimise the impacts of Heathrow Airport expansion, regardless of members' individual support or opposition to such expansion. HSPG is mainly funded through a Service Level Agreement (SLA) with Heathrow Airport Ltd (HAL) to directly input into the evolution of the Development Consent Order (DCO) scheme/masterplan at pre-application stages. It also has some Government funding to support the production of some joint spatial planning work, and some funding from Heathrow West Ltd to input into the evolution of their DCO masterplan. HSPG members provide resource through staff and associated resources.

HSPG responded in August 2019 to the CAA's initial consultation on the costs of expansion. The points we made there still stand, and we are in agreement in terms of agreement on the proposals for more robust scrutiny and monitoring of costs, and would reiterate our request for further transparency on costs. We would, however, like to reiterate a key point made in our response. We would like to note that no reference was made in your response to the August consultation of these points or any reference made to our submission.

There is real concern from HSPG members that there will be a significant push from the CAA and other stakeholders such as IAG for HAL to carry out further value engineering and cost cutting across the rest of the expansion project. While it is right that there is robust scrutiny of all costs and the scheme delivers value for money, this value should not be judged in purely monetary terms. It is vital that the project maximises the benefits to the local community and delivers a legacy commensurate with the scale of the project and its impact. These impacts include, for example, the loss of around 1,300 acres of Green Belt. The project needs to ensure mitigations and compensations are in place to minimise the negative impacts on local communities and the environment, and that measures to

minimise these impacts and improve quality of life are holistic and not cut back. As an example, a holistic approach to green infrastructure and improved public transport and active travel accessibility are both vital to maximise benefits and reduce impacts. These areas provide significant value in themselves to the economy and quality of life of the sub region. Securing a legacy and benefits to the community must not be sacrificed in the face of pressure to reduce costs.

I hope that the above consultation response is helpful, please do not hesitate to contact me with any queries.

Yours sincerely,



Lucy Owen

HSPG Executive Director on behalf of HSPG (members below)

Full HSPG members:

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| ❖ Bucks County Council | ❖ Spelthorne Borough Council |
| ❖ Colne Valley Park CIC | ❖ Surrey County Council |
| ❖ Enterprise M3 LEP | ❖ Thames Valley Berkshire LEP |
| ❖ London Borough of Ealing | ❖ Bucks TV LEP |
| ❖ London Borough of Hounslow | ❖ Royal Borough of Windsor and Maidenhead |
| ❖ Runnymede Borough Council | ❖ Elmbridge Borough Council |
| ❖ Slough Borough Council | |
| ❖ South Bucks District Council | |