



11 August 2026

Green Impact Ltd
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FISHBOURNE
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To: economicregulation@caa.co.uk

Mr. Tim Johnson
Interim-Director for Consumers and Markets
UK Civil Aviation Authority

Dear Tim,

CAP3286: Capital governance – the need for an urgent and integrated approach

I am writing to reinforce the case for moving quickly to a single, integrated model for the governance and assurance of Heathrow's capital investments. I offer my insights freely and independently.

As a senior independent Government Advisor (IPA/NISTA) for the past 20 years, I have been used by the government to assess and design solutions for 4 of UK's largest infrastructure projects. In each case, I was the Senior/Strategic Advisor or programme director and in 3 cases correctly reported on fundamental governance/assurance failures that directly led to increased costs of between £10-40 billion. My experience included advising on HS2, the Nuclear Decommissioning Authority's £40 billion estate and major Department of Health programmes (NPfIT), as well as designing and reviewing governance and assurance arrangements across many complex public and private-sector portfolios.

That experience has repeatedly demonstrated a simple lesson; **when the scale and complexity of investment increases materially, strong governance needs to be established before the expenditure accelerates, not afterwards.**

That is particularly important at Heathrow. You are approaching a period in which H7 carry-over, H8 investment, early expansion expenditure and subsequent major expansion projects could all be progressing at the same time. The answer to that complexity cannot sensibly be multiple parallel governance and assurance regimes. It should be one integrated framework, providing a coherent view of the portfolio and clear accountability for the decisions being taken. There are many reasons for this, not least the strategic allocation of: resources (finance; critical project/commercial skills; exceptional delivery talent; contingency allocation); unified customer experience impact assessments; communications; compound risk analysis; and senior management bandwidth for assuring timely decisions.

This is also consistent with my experience of designing the Department for Transport's portfolio function and, earlier, helping to design and align TfL's £10 billion Investment Plan (mostly private finance) across its different modes of transport. At TfL, I was involved in designing both the oversight function and the Independent Engineers assurance

mechanism. The important lesson was that integration at portfolio level does not weaken scrutiny. Properly designed, it makes scrutiny more effective because decision-makers can see priorities, dependencies, risks and trade-offs together rather than through separate institutional or project silos.

I therefore strongly support the principle of a **single CIC-led capital governance and assurance framework**, encompassing H7 carry-over, H8, expansion and major projects, including early expansion costs. The objective should be to establish one place in which the CAA and airlines have a clear line of sight across the investment portfolio and can test whether expenditure is necessary, efficient, affordable, deliverable and demonstrably in consumers' interests. I note that this is also the central proposition in the proposed CIC arrangements.

The CIC should consequently be more than an additional consultation forum. It needs to be a genuine governance gateway, operating across the investment lifecycle and supported by independent assurance and appropriate specialist expertise. Material proposals should be tested before commitments are made, with the ability to challenge business cases, affordability, delivery assumptions and benefits and, where necessary, require proposals to be reconsidered.

I also believe there is a strong case for considerably greater urgency.

My experience of major government programmes – including conducting and leading major-project reviews – is that transition to stronger governance does not need to become a multi-year redesign programme. Indeed, prolonged transition can itself create risk. Accountabilities become blurred, organisations devote resources to servicing parallel structures and important decisions continue to be taken under arrangements that everyone has already agreed need to change.

The proposed 90-day transition should therefore be treated as a focused restructuring exercise. Existing H7 projects can be migrated in a controlled way, while H8 and expansion-related expenditure should begin under the new arrangements. The proposed structure makes that distinction practical: only the existing H7 portfolio requires transition; the other workstreams can start within the new CIC framework.

This is not an argument for rushing investment decisions. Quite the opposite. One of the most important lessons from major infrastructure programmes is the need to establish the right governance, accountabilities and assurance **early**, so that subsequent investment decisions can be taken with greater confidence. My experience of Crossrail, HS2, TfL and other major programmes has reinforced that good governance depends on clear authority and accountability (the link between them is critical), and on establishing those foundations early enough to influence decisions rather than reviewing them after the event.

For the same reason, independence matters. The new arrangements should have an independent chair, meaningful airline representation and assurance that is demonstrably outside HAL's control. HAL must retain clear accountability for delivering its projects, but portfolio-level governance needs sufficient independence to determine whether the right projects are being pursued before focusing on whether individual projects are being delivered right. That distinction is important.

There is therefore a window now to put in place a governance model proportionate to the scale of what Heathrow is proposing. In my view, allowing several different regimes to develop alongside one another would add complexity precisely when the objective should be to reduce it.

I would encourage the CAA to move decisively towards **one integrated framework, independent scrutiny and a rapid cutover**, with implementation targeted within 90 days.

I stand ready to support the CAA and stakeholders in making that transition swiftly and effectively.

Yours sincerely,

A handwritten signature in blue ink, reading "Paul Mansell". The signature is fluid and cursive, with the first name "Paul" and last name "Mansell" clearly distinguishable.

Paul Mansell PhD, MSc, MPhil, MA
Green Impact Ltd