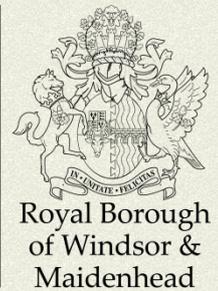


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Stephen Gifford  
Head of Economic Regulation  
Civil Aviation Authority (CAA),  
Aviation House, Gatwick Airport South,  
West Sussex,  
RH6 0YR

Friday 15th September 2017

Dear Mr Gifford

**Re: Royal Borough of Windsor & Maidenhead  
CAA: Consultation on core elements of the regulatory framework to support  
capacity expansion at Heathrow**

On behalf of the Royal Borough of Windsor & Maidenhead (RBWM), I would like to take the opportunity to formally submit the representations to the CAA consultation with regard to the 'core elements of the regulatory framework to support capacity expansion at Heathrow'.

This submission follows representations to the department concerning its previous consultations on airspace design earlier this year and further to correspondence regarding our objection to expansion at Heathrow; sent to the Secretary of State for Transport and the Governments legal department, via our instructed legal representatives (Harrison Grant) in partnership with the London Boroughs of Hillingdon, Richmond, Wandsworth and Greenpeace.

It should be noted that whilst most of this consultation concerns the wider economic implications associated with capacity expansion, this response focusses purely on the broader surface access constraints that are present and would cause a severe detriment to local residents, should government decide to proceed towards an ill-advised three runway Heathrow.

The Royal Borough maintains that Heathrow is a poor site for expansion and asserts that the airport can get better, without getting bigger. Taking this into account, should the Government maintain that the need for expansion can only be within the south east, the proposal at Gatwick remains the only viable and least environmentally damaging long-term option for consideration.

Yours sincerely



**Cllr John Bowden  
Chairman of the Aviation Form  
Royal Borough of Windsor & Maidenhead**

**Alison Alexander - Managing Director**

Town Hall, St. Ives Road, Maidenhead, SL6 1RF

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## **CONSULTATION RESPONSE**

### **Chapter 6: Surface Access**

- 1.1 The Royal Borough concurs with the CAA 'user pays' principal and would encourage this be strengthened to align with the 'polluter pays principal' that resides within a number of other key environmental policies.
- 1.2 The airport and government have yet to confirm the exact infrastructure plans (and therefore cost associated) with the works to highways and rail. The significant cost of either of the current options associated with a third runway should be attributed solely to the airport. To pass these costs on to the taxpayer would present a significant risk (4.19) and should result in the project being deemed non-viable.
- 1.3 The Borough would advocate the EAC's analysis, such that 'there needs to be clarity over how the pledge [that there will be "no more cars on the road" as a result of expansion] will be delivered and monitored (EAC 'The Airports Commission Report Follow-up: Carbon Emissions, Air Quality and Noise', 7th February 2017)
- 1.4 The implications for local authorities if such aspirations are not achieved are significant, owing to the ongoing LA responsibility to deliver air quality compliance. The cost of failing to comply with air quality legislation (in terms of public health cost) needs also to be considered within any calculations.
- 1.5 The consultation (para 6.27) notes the aspirational target of the airport and the importance of maximising the proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040 for passengers.
- 1.6 The Royal Borough would highlight to the CAA that Heathrow's current public transport modal share is circa 38-42% (Campaign for Better Transport: Heathrow and Surface Transport Stress, 2013).
- 1.7 It is therefore the recommendation of the Royal Borough that current 55% modal share proposal (without supporting delivery information/evidence) be dismissed as purely aspirational and not achievable.
- 1.8 Furthermore, the wider economic costs of surface access provision need to be taken into account, including the rail upgrades required to both trains and track (including the level crossing limitations at villages such as Sunningdale).

- 1.9 With regard to supporting surface access schemes; the airport scheme promoters have pledged to meet the cost of surface access schemes required to make a runway open. However, there are significant discrepancies between the scope of the works proposed by the promoters and that which is deemed necessary by the Airports Commission.
- 1.10 For Heathrow, the Commission indicated that the M4 would need to be widened between Junctions 2 and 4B. This is a major change in scope and would incur substantial additional costs, in addition to introducing conflicting priorities associated with increased traffic. The NPS indicates that the Government is considering capacity on the M4 as part of its future planning in relation to the national road network. This is a material consideration for the Heathrow proposal and would have a major impact on the strategic road network both during and after construction. Therefore clarification should be sought as to whether or not the scheme is required.
- 1.11 Highways England<sup>1</sup> was asked to undertake a robust review of the Airport Commission's costs. Their report indicated that there is "significant potential for cost overruns of the largest schemes", which include the M4 J2 to J3 Widening and the M25 tunnels and works south of Junction 15. Highways England also raised concerns about the widening of the M4 between Junctions 2 and 3, which they consider to be "very challenging", with "numerous unknowns in relation to key cost drivers".
- 1.12 Furthermore, Highways England found "substantial variance" between the Commission's figures and their estimate of future operation and maintenance costs for the Heathrow SRN surface access proposals. They highlighted a 49% discrepancy between the Commission's cost estimates and Highways England's maximum estimate, with an additional £323 million potentially required over a 60 year period. This discrepancy must be acknowledged and factored into the economic business case for the Heathrow proposal.
- 1.13 In terms of delivery, Highways England highlighted a series of complex interdependencies that represent significant risks to the project timeline for the Heathrow proposal. In particular the A4/M25 interface represents a risk to the delivery of a new or extended runway at Heathrow. This level of risk must be acknowledged in any consideration of the Heathrow proposal. As a minimum, further work should be undertaken to more fully understand the risks and possible mitigations.
- 1.14 The Draft NPS Statement suggests that "Western Rail Access could link the airport to the Great Western Main Line, and Southern Rail Access could join routes to the South West Trains network and London Waterloo Station". The Borough considers that these schemes are essential to alleviate congestion and improve access to Heathrow regardless of whether or not the airport is expanded. However, despite much work having been undertaken, the Western Rail Access scheme is yet to be confirmed within

<sup>1</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/562063/airports-commission-surface-access-works-strategic-road-network-proposals-validation-of-costs-and-delivery-assumptions.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/562063/airports-commission-surface-access-works-strategic-road-network-proposals-validation-of-costs-and-delivery-assumptions.pdf)

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Network Rail's delivery programme, and the Southern Rail Access scheme remains at the conceptual stage. Also the Southern Rail Access scheme could be impacted by the proposed River Thames Scheme. Therefore, both schemes carry a significant level of risk, which should be acknowledged.