



Response to consultation on Working paper on regulatory models CAP 3195

This response is submitted by Heathrow Southern Railway Ltd, the promoters of the widely supported proposal to provide Southern rail access to Heathrow. The scheme is designed to be largely privately financed and we therefore welcome the opportunity to respond to this consultation.

The paper notes:

- *'Expansion will require the delivery of very considerable new assets, including ... surface access infrastructure. Delivery of expansion will also require capex to mitigate the adverse environmental effects of expansion;'* and
- *'Components of the expansion scheme' include a 'surface access project.'*

We are pleased this recognises that new surface access infrastructure will be critical to delivering expansion, for example in meeting the ANPS mode share conditions.

We agree that *'rail programmes'* such as Heathrow Southern Railway could be *'discrete'* and *'separable'* but not that they are *'non-core projects ... within the expansion programme.'*

We hope further consideration of regulatory models will therefore explicitly recognise the critical dependency between new surface access infrastructure and Heathrow expansion.

Heathrow Southern Railway
20th January 2026