



CAA Regulation Team (economicregulation@caa.co.uk)
cc Hannah Newell, DfT (hannah.newell@dft.gov.uk)
Via Email

29th May 2026

Dear CAA Economic Regulation Team,

I am writing as Chair of the Heathrow Area Transport Forum to express our concern regarding the proposed settlement for H8 set out in your CAP 3232 "Initial Proposals" document, specifically in relation to surface access capital expenditure.

Heathrow is targeting significant increases in passenger volumes over this period - an additional 6-10m passengers a year, building on already record levels. With a declining proportion of transfer passengers, this growth will translate into a substantial increase in point-to-point journeys to and from the airport each day. This will place additional pressure on an already constrained and highly congested transport network serving Heathrow.

Evidence from the most recent strategic route studies by National Highways (2023) highlights the scale that this challenge represents for the network. The M25 corridor around Heathrow (particularly Junctions 10–16) is already among the most congested sections of the Strategic Road Network, with Heathrow-related demand identified as a key contributing factor. Forecasts suggest that delays in this corridor will worsen further as traffic grows, with peak-hour congestion and resilience issues expected to intensify without intervention. This aligns with wider assessments, including TfL work indicating that substantial investment is required simply to accommodate future demand and avoid severe overcrowding across London's transport network.

Against this backdrop, resilience for both passengers, staff, freight and logistics is critical. The ability to access the airport reliably—whether for work or travel—is fundamental to its operation as a national hub, and issues with the effective and reliable movement of freight could have an economic impact on Heathrow.

There are also important wider impacts to consider. Increased road traffic without corresponding mitigation risks worsening local air quality and undermining progress on decarbonisation. The CAA has a secondary duty to consider these issues, however it is not immediately clear how that has been accommodated in CAP3232.

In this context, the Heathrow surface access team has developed a relatively modest and targeted set of capital proposals designed to address these pressures and support mode shift. In our view, these are not overly ambitious or speculative enhancements, but practical interventions intended to maintain network functionality and resilience in the face of forecast growth, and continue to support the decarbonisation of transport.

There are clear, practical opportunities deliverable within a reasonable resource envelope to improve resilience and modal choice, including enhanced bus connectivity (for example at Hatton Cross), support for the transition to electric vehicles, and improved cycling provision. While active travel initiatives in particular are primarily aimed at Heathrow colleagues, they can deliver wider network benefits by reducing staff car trips by thousands of vehicles per day, thereby freeing up capacity for passengers and freight.

While we recognise and welcome reassurance that key revenue-funded programmes—such as the Sustainable Transport Zone which supports many local bus service enhancements —have largely

been protected, our review of the CAA's initial H8 proposals suggests that the associated capital programme has effectively been reduced to zero. This raises significant concerns. Without capital investment to support complementary infrastructure improvements, the effectiveness of revenue measures alone will be inherently limited.

Delaying investment is also likely to reduce value for money, as necessary schemes become more complex and costly to deliver in a more constrained and congested environment. Achieving meaningful modal shift will take time; deferring action potentially risks entrenching car-based behaviours, making future interventions less effective and harder to deliver. By contrast, early investment helps create the necessary headroom on the network to accommodate future pressures.

We are therefore concerned that the CAA's current approach to assessing permissible capital expenditure may not be giving sufficient weight to the systemic impacts of airport growth on the wider transport network. The needs of airport users—passengers, employees and freight operators alike—cannot be met if surface access constraints result in unreliable or severely delayed journeys. Put simply, the success of Heathrow as a hub depends not only on what happens within the airport boundary, but on the ability of people and goods to reach it. Consumers' interests are not furthered by turning the M25 and M4 into a car park.

We urge the CAA to give further consideration to this issue and to revisit the treatment of surface access capital investment within the H8 settlement. We would welcome the opportunity to meet with the CAA team to discuss these matters further and to share the Forum's perspective on how best to ensure that surface access keeps pace with Heathrow's future growth.

Kind Regards,

Handwritten signature in blue ink, appearing to read 'A.J.C.' followed by a stylized flourish.

Anthony Smith
Chair, Heathrow Area Transport Forum