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Via email to: [economicregulation@caa.co.uk](mailto:economicregulation@caa.co.uk)

Christopher Bate  
Senior Planning Manager  
National Highways  
Three Snowhill,  
Snow Hill Queensway,  
Birmingham,  
B4 6GA

Email:  
[christopher.bate@nationalhighways.co.uk](mailto:christopher.bate@nationalhighways.co.uk)

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## CAA CONSULTATION CAP3232 H8 INITIAL PROPOSALS

Dear Sir/Madam,

National Highways welcomes the opportunity to respond to the Civil Aviation Authority's (CAA) consultation on its initial proposals for the H8 price control for Heathrow Airport Limited (HAL), covering the period January 2027 to December 2031.

National Highways is a government owned company which operates, maintains and improves the strategic road network (SRN) as the strategic highway company appointed under the provisions of the Infrastructure Act 2015 in accordance with the [Licence](#) issued by the Secretary of State for Transport.

National Highways is a statutory consultee to the planning process. It has a specific remit to deliver economic growth through the provision of a safe and reliable SRN, in line with the provisions set out in [DfT Circular 01/2022: The strategic road network and the delivery of sustainable development](#). The Circular sets out how National Highways will work with developers to ensure that specific tests are met when promoting a scheme. This includes ensuring that the transport impact is understood, any mitigation (or other infrastructure) is designed in accordance with the relevant standards and that environmental impacts are appraised and mitigated accordingly.

National Highways' is concerned that the H8 initial proposals do not include the capital budget to enable the development and delivery of the surface access schemes required to manage the impacts of forecast growth during the H8 period.

Given the already constrained nature of the SRN in the vicinity of the airport, particularly along the M25 and M4 corridors, even marginal increases in demand are likely to have a disproportionate impact on network performance, resilience and journey reliability.

In this context, it is critical that the H8 settlement allows for a proportionate level of capital investment to come forward early in the period. These interventions will have

long lead times, and deferring investment risks a position where schemes are brought forward only after network conditions have already deteriorated, limiting their effectiveness and increasing disruption during delivery. Early investment is therefore essential to ensure that mitigation keeps pace with growth, rather than reacting to it.

There is also a clear risk that as congestion increases, the cost and complexity of delivering interventions typically rise. Providing sufficient headroom within H8 would enable more effective planning and delivery, helping to manage both cost and disruption.

This issue is further amplified by the potential for future expansion at Heathrow. Allowing surface access conditions to deteriorate ahead of any further development would increase the challenge of managing both construction and operational impacts.

Finally, National Highways emphasises the importance of reliable access for freight and logistics, alongside passengers and the airport workforce. Constraints on the network that affect journey time reliability, and access will have wider economic implications, reinforcing the need for a balanced approach that ensures surface access provision keeps pace with demand.

National Highways therefore encourages the CAA to reconsider the level of capital provision associated with surface access proposals within the H8 settlement to ensure sufficient headroom is maintained to support timely and effective intervention.

Yours sincerely,



Christopher Bate  
Senior Planning Manager  
Email: [Christopher.bate@nationalhighways.co.uk](mailto:Christopher.bate@nationalhighways.co.uk)