

Letter to: feedback@heathrowconsultation.com



Copied to:

Tony Caccavone and James Cornelius
Heathrow Airport Ltd
The Compass Centre
Nelson Road
Hounslow
Middlesex
TW6 2GW

13 September 2019

Response to Heathrow Airport Expansion Consultation

This is the response of Heathrow Southern Railway Ltd (HSRL) to Heathrow's Airport Expansion Consultation, running from 18 June to 13 September 2019. We note this is a statutory consultation, which forms the prelude to an application from Heathrow Airport Ltd for development consent under the Development Consent Order (DCO) process.

HSRL is a private sector company established in 2016 for the sole purpose of promoting and building a Southern Rail Link to Heathrow Airport (SLRTH). The company was founded by individuals with extensive experience in railway development and raising private finance for publicly beneficial infrastructure. In 2017 the multinational engineering and design consultancy AECOM invested in the company.

The construction of under 8 miles of new electric railway by HSRL will enable Heathrow Airport to be connected by direct train to south west London, Surrey and Hampshire. Trains will be fast and frequent, can carry significant volumes of passengers, and will have journey times materially quicker than road. The creation of the HSRL link will trigger a modal shift from road to rail, easing motorway congestion, reducing carbon emissions and improving air quality.

Our plans for a SRLTH are well developed, fit within the capacity constraints of the national rail network and comply the Railways Regulations. We have discussed our plans with the Department for Transport (DfT), Office of Rail and Road (ORR), Civil Aviation Authority (CAA), Transport for London (TfL) and Heathrow Airport Ltd (HAL), and numerous local authorities, MPs, stakeholders and business groups.

Our proposed new rail link will be privately financed. Our business case modelling shows that the scheme's costs can be covered by the farebox revenues brought by new to rail users. It is user funded, so does not need subsidy from Government or any capital contribution from HAL.

HAL's own analysis in the Expected Case shows that a SRLTH scheme such as that promoted by HSRL raises the airport's public transport mode share by 4% by 2040, brings another 1 million of the UK's population within an hour of Heathrow by public transport, and will be used by 3.9 million passengers pa by 2040. It makes a significant localised difference: for example it raises Guildford's public transport mode share from 9% today to 21% in future.

But the scheme will not happen by itself. It needs HAL and the DfT to move from their generic statements of support to a binding commitment that a SRLTH scheme will be used, and will proceed as a core part of HAL's future plans. HAL can play a key role in maximising the likelihood of a SRLTH going ahead in the near term – we expand upon this in our response.

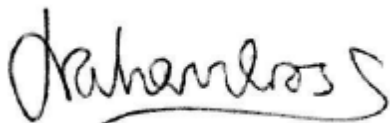
We also cite, as key, the report of the House of Commons Transport Committee on the Airports National Policy Statement (ANPS) published on 23 March 2018 which stated in paragraph 43: *"Schemes such as Southern and Western Rail Access are essential for a two-runway Heathrow, never mind a three-runway airport with an extra 50% capacity."* This supports our view that a SRLTH is needed whether or not HAL's plans to expand are ultimately successful.

In this consultation reply we focus our response by answering eight questions of most relevance to our interests. Our replies are informed by our studying of the consultation documentation provided by HAL on its website, with particular focus on the documents named Preliminary Transport Information Reports (PTIRs) and the Surface Access Proposals (SAP) documents, and answers by HAL on 6 September to some of the clarification questions we asked on 19 August.

Our reply explains our view that, if HAL proceeds to the DCO stage arguing that the ANPS June 2018 requirements on modal shift to public transport can be achieved without reliance on a well considered SRLTH scheme, the DCO is at risk of failing. This is because the current Assessment Case contains unrealistic assumptions about the ability of existing rail routes and road to accommodate significantly more passengers and staff, and is heavily reliant upon the hostile measure of a Vehicle Access Charge (VAC) which we think will be unacceptable to users.

We are happy to discuss our response, but ask that it is considered without prejudice to future statements we may make during a DCO examination in public.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Graham Cross', written in a cursive style.

Graham Cross
Chief Executive

Appendix: Response to Consultation Questions

Masterplan:

Q1: Please tell us what you think about any specific parts of our Preferred Masterplan or the components that make up the masterplan

HAL advise in the consultation materials that the Preferred Masterplan for expansion makes provision for both the Southern and Western Rail Links to be easily connected to the existing rail terminus at Terminal 5. We welcome this stance. But for assurance, we would like to see this proven on technical drawings, as it is not at all apparent on the material we have viewed at consultation events.

We have a more specific concern that, at the Terminal 5 station end, Network Rail's plans for the Western Rail Link DCO do not make provision for a junction with a potential SRLTH, and their proposals for a spray lined concrete construction methodology in this location will make it unduly expensive for a SRLTH to subsequently connect into a tunnel constructed by WRLTH. It is also important that the track layout and tunnel geometry allows a junction.

The consultation (SAP para. 2.8.6) states "during 2019/20 we will also set out a technical and design prospectus of Heathrow's infrastructure in the vicinity of a Southern Rail Link, to provide promoters with consistent information to support their design proposals." We welcome this and ask that it be provided as soon as possible so that HAL, Network Rail and SRLTH scheme promoters can ensure co-ordination between existing and proposed airport and rail infrastructure. This is critical in view of timescales for the proposed WRLTH and north west runway DCO applications.

It is helpful to both SRLTH and WRLTH that the consultation (para. 3.3.17 Scheme Development Report 2) confirms "T4 is anticipated to lose its heavy rail connection by 2030, should the Southern Rail Link to Heathrow be progressed," and notes (para. 3.3.23) "this is because the existing rail junction to T4 eventually becomes an unacceptable capacity constraint on the rail spine." We welcome this recognition of the need to maximise the capacity, efficiency and resilience of the existing rail "spine" through the Heathrow campus.

However, this is inconsistent with other parts of the consultation – for example SAP para. 3.2.162 - which states "given that proposals for the Southern Rail Link are still at an early stage, we do not believe that the scheme will be brought forward and open to passengers by 2030" and so HAL puts SRLTH in the modelling for 2040. HSRL's SRLTH scheme can be delivered well before 2040, whilst the Airports National Policy Statement Designated in June 2018 (ANPS) Clause 5.7 requires a SRLTH to commence operation as soon as possible after a third runway becomes operational – so conservatively assuming a 14 year wait seems to us to be inconsistent with the ANPS.

Future Operations:

Q8: Managing early growth

We note that in June 2019 HAL consulted on its wish to gain permission through the expansion DCO process to raise the current Air traffic Movements (ATM) cap of 480,000 ATMs by a further 25,000 ATMs from as soon as just one year after the approval of the DCO. We understand the commercial rationale for this, but highlight the disconnect with the ANPS, which was Designated a year earlier in June 2018.

The ANPS creates a number of conditions to expansion around reducing road use, but these are stated as targets to be achieved in snapshot years of 2030 and 2040. Therefore, if the DCO granted permission for HAL to raise the ATM cap, around 8 years of passenger volume growth could occur unchecked by the protections within the ANPS. We think that HAL should undertake to maintain the current legal cap on ATMs until it has put in place the Assessment Case measures to improve public transport. Otherwise, prior to 2030, growth in road traffic and pollution can occur without mitigation, which we think is contrary to intent of Parliament when it approved the ANPS.

Surface Access:

Q9: Please tell us what you think of our proposals and how we could further encourage or improve public transport access to the airport

Parliament has placed conditions on Heathrow expansion via the ANPS approved by Parliament and Designated by the Secretary of State for Transport in June 2018. These include ANPS Clause 5.17 which requires HAL to show how it will increase 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; and should include details of how it will achieve a 25% reduction in all staff car trips by 2030, and a reduction of 50% by 2040.

We note HAL's position that it:

- is fully supportive of both the proposed Western and Southern Rail Links;
- sees as a key priority supporting DfT and Network Rail on the delivery of the Western Rail Link to Heathrow (WRLTH) and SRLTH schemes; and
- has concluded that its Surface Access Proposals cannot be predicated on the delivery of SRLTH and WRLTH schemes as these are promoted by third parties and are not within HAL's control with progress on them being controlled by the DfT.

Therefore, HAL has put forward an Assessment Case (which assumes no SRLTH or WRLTH) and an Expected Case (which assumes SRLTH by 2040 and WRLTH by 2030). The Assessment Case is the one which will be scrutinised in the DCO process, meaning that the Expected Case is essentially for information. In the consultation materials, HAL seek to demonstrate through the Assessment Case how

it will achieve the ANPS Clause 5.17 requirement to raise public transport mode share without a SRLTH or WRLTH in place.

We do not think the consultation material has provided sufficient evidence that HAL can in reality achieve the ANPS Clause 5.17 requirements without SRLTH and WRLTH in place, and in a manner which is acceptable to the public and stakeholders.

In particular:

- To achieve the ANPS target, the number of passengers to be carried by public transport has to increase from 21.8 million pa today to 50.5 million pa by 2040 – i.e. a more than doubling of public transport use, without any commitment to building new rail infrastructure
- We do not think this is realistic, as HAL's explanations for how and where this significant extra demand will be accommodated seem to result in overloading of existing systems, make unduly optimistic assumptions about the ability of coach and don't properly consider the geographical origins.
- Looking in more detail, the explanation in the SAPs for how the 28.7 million per annum *increase* in the number of passengers which public transport must accommodate seems to us to be unrealistic as it assumes:
 - o 2 – 4 million extra passengers a year can be accommodated by improved / extra coach routes (SAP Table 3.13). To carry an extra 4 million passengers per year by coach would require eight more coach operations on the scale of the successful Oxford Airline service to be developed from scratch. We do not think there are sufficient markets suitable for coach to serve for this to be achieved, bearing in mind coach's poor journey times, tendency to get stuck in traffic and low frequency which make it unappealing to airport travellers who value time and dependency highly
 - o 6 – 8 million extra passengers a year can be accommodated by an upgraded Piccadilly Line (SAP Table 3.10). This would nearly double current volumes. We do not see how a 25% increase frequency from 12tph to 15tph will accommodate a near doubling in passenger volumes
 - o 6 – 8 million extra passengers a year can be accommodated on Heathrow Express, encouraged by lower fares and improved ticketing (SAP Table 3.6). We note there is no plan to add capacity to Heathrow Express (HEX), and so we are sceptical that it can accommodate such a large volume increase
 - o 8 – 10 million passengers a year will be accommodated on the Elizabeth Line (SAP Table 3.7). The Elizabeth Line and HEX both run via Paddington to Central London, which already has a public transport mode share of over 50%, so we are unsure where the 18 million extra rail passengers heading towards Paddington will have switched from.

The SRLTH and WRLTH schemes are forecast by HAL in the Expected Case to carry 6.7 million passengers by 2040 (SAP Tables 3.11 and 3.12). Between them they could carry 7% of passengers on a 2040 sized airport. This is a significant measure in the context of HAL's challenge to raise public transport mode share from

38% today to 55% by 2040. We would suggest that the SAPs would be far more convincing if HAL incorporated the SRLTH and WRLTH schemes into the Assessment Case, allowing the scale of passenger volume which has to be accommodated on coach / Crossrail / Piccadilly Line and HEX to be eased to less unrealistic levels, and to reflect a more reasonable geographical spread.

Further points of concern to us about the Assessment Case's assumptions are:

- The Assessment Case commentary and table highlights the beneficial role of HS2 and assumes Phase One completing by 2030. Yet the Chairman of HS2 has said that he does not believe that 2026 for initial services on Phase One is realistic, and has given a recommended schedule of 2028 to 2031 for a staged opening of Phase One. This was reported to Parliament by the Secretary of State for Transport on 3 September 2019. Therefore, we think HAL should cease to depend upon completion of HS2 Phase One for its Assessment Case, and should commit to alternative measures in its place.
- It does not quantify the enhanced role which buses could play.
- Buses and coaches usually have diesel engines so contribute to air pollution in an area which already has illegally high concentrations of NOx, whereas all the trains on our proposed SRLTH would be electric so do not emit NOx or CO2 at the point of use.
- The Assessment Case shows that to achieve the ANPS Clause 5.17 requirements needs a significant Vehicle Access Charge (VAC) to be levied upon all road vehicles arriving at the airport from 2026. We think that if no SRLTH and WRLTH are in place the VAC is geographically inequitable, will be seen as just another tax and will be unacceptable to passengers, local authorities, and airlines. We expand upon this in answer to Question 10.

We do not think that HAL has shown that the measures in its Assessment Case can fulfil its public promise that expansion will result in landside airport-related traffic no greater than today unless a SRLTH is in place because:

- Airport expansion nearly doubles airport related vehicle kilometres on roads within the Borough of Spelthorne - PTIR Volume 6 Part H Graphic 29.14 shows an increase from c. 55,000 to nearly 100,000 vehicle km each day;
- Airport expansion causes a significant increase in traffic on roads to the south west of Heathrow. We note that the M25 through Spelthorne and Runnymede, which already operates considerably beyond its design capacity, sees an increase in traffic flow of over 2,500 vehicles per day (PTIR Volume 6 Part H Graphic 28.19); and
- HAL plans to increase the number of passenger car parking spaces from 23,500 today to 44,800 by 2040 (SAP Graphic 3.61) of which 22,000 will be built in a Southern Parkway on the green belt.

We would suggest that these are all undesirable consequences of HAL's decision not to accept a SRLTH into the Assessment Case. If a SRLTH of the sort HSRL proposes were brought into the Assessment Case it would go a long way to mitigating the road traffic impact in the south west quadrant, and would enable a rather smaller Southern Parkway to be built, consuming less Green Belt land.

We realise that SRLTH is not yet a committed scheme and note that HAL uses this as a reason why its outputs cannot be relied upon in the Assessment Case. But one of the reasons why SRLTH has not yet become a committed scheme is because HAL have not wholeheartedly supported it and have been content for DfT to take the lead. HAL may be concerned that it will become liable for the cost of a SRLTH and that this will add further cost pressure to expansion. But this is not the case with HSRL's model, which is user funded.

We recommend that HAL should take the following near term actions. These would have the effect of removing ambiguity, making it easier for DfT to play its role, and therefore making it much more likely that a SRLTH will become a commitment in the near term:

- Expressing a preference for a scheme – one of the reasons why development of SRLTH is behind WRLTH is that there is more than one alternative idea for the best form of a SRLTH, as HAL describe on page 136 of its SAPs. HAL expressing a preference for a SRLTH scheme would cause one of the SRLTH promoters to emerge as the front runner and most likely the other SRLTH promoters to drop out. HAL should choose the scheme which achieves the most significant beneficial impact on public transport mode share. One of the promoters having HAL's endorsement would remove a key ambiguity and enable the DfT process to be faster and more focussed.
- Accepting that a SRLTH is necessary to achieve the ANPS requirements in a manner which is robust and publicly acceptable, and reflecting this in the Assessment Case which it will put forward as part of its DCO application.
- Accepting that a SRLTH could be in place much sooner than the 2040 date shown in the Expected Case. HSRL's position is that if we start immediately we can get a SRLTH open by the end of 2026. There is no physical reason why a SRLTH cannot be complete until 2040. ANPS Clause 5.7 requires a SRLTH to commence as soon as practicable after the new runway comes into operation. We do not think that shunting SRLTH into a 2040 column in the Expected Case is consistent with this requirement of the ANPS.

The ANPS (Clause 3.40) states that the Government would expect the cost of the SRLTH to be partly offset by airport contributions. HSRL's business case work shows that the scheme is user funded, and does not need a capital contribution from HAL for any work beyond HAL's boundary to be viable. So, accepting HSRL as preferred developer and relying on SRLTH's outputs in the Assessment Case will not add to the cost of expansion but will make HAL be able to demonstrate to a DCO examination with much more resilience that it can achieve the ANPS public transport mode share requirements.

Whilst HSRL does not ask HAL for any financial contribution to the capital costs of a SRLTH (beyond the limit of HAL's current assets), we do think HAL could take a series of facilitative measures to enable the chosen SRLTH developer to proceed quickly to be able to finance its activities. These are in line with ANPS Clause 3.40 and are capable of approval by the CAA.

Our advice is that to maximise the prospect of SRLTH occurring, HAL should commit to these facilitative measures:

- Offering to underwrite a proportion of the scheme's development costs – this would enable the chosen SRLTH developer to raise further risk capital with knowledge that if the consenting process failed not all of its investors' funds would be at risk of write off.
- Confirming that once HSRL's SRLTH infrastructure is built, HAL will extend HEX services over it, effectively extending HEX to Woking, Guildford and Basingstoke. This will give renewed post-Crossrail purpose for HEX and strengthen the business case for the HSRL scheme by bringing in considerable non airport related revenue arising from new rail network journey opportunities which avoid the need to cross central London by tube.
- Expressing the view that WRLTH should be served by an extension of Crossrail trains, extinguishing the idea that HEX trains extend to Reading.
- Topping up any revenue shortfall – HSRL's scheme structure requires DfT through the franchising system to carry farebox revenue risk on the success of the services it specifies to run over a SRLTH. In our view, it would help DfT to accept this risk and potentially ease obstacles around balance sheet classification if HAL would agree that it would top up any airport passenger/staff related shortfall against forecast, perhaps by using funds raised through the VAC/HULEZ or seeking CAA approval of a RAB Addition.

If HAL does not move from generic support for SRLTH to a concrete commitment underpinned by it taking these facilitative measures, there is a very real risk that a SRLTH will not occur at all. This would threaten the achievability of expansion, as our discussions show that the support of some local authorities for expansion is linked to a requirement for a SRLTH to be in place so that their residents and businesses are able to access the extra opportunities afforded by a larger Heathrow without causing more road congestion and pollution.

Q10: Please tell us what you think about our proposals for the Heathrow Ultra Low Emission Zone and Heathrow Vehicle Access Charge as ways to manage congestion and air quality impacts

We understand the transport planning rationale for levying a charge on road vehicles to 'push' a switch from road to public transport, and are supportive of this principle. The VAC and HULEZ provide a useful revenue stream and we would suggest that this should be hypothecated and ring fenced for spending on improved public transport and not cross subsidise HAL's other costs via the single till RAB.

We are supportive of HAL's proposed HULEZ, as a measure to improve air quality around the airport.

We note HAL's calculations in the Assessment Case (SAP Table 2.9) which show a projected VAC of (in 2017 prices) £18 in 2030 and £29 in 2040. Assuming RPI inflation of 2.5% per annum, this would result in an actual charge level of £30 in 2030 and £50 in 2040. This contrasts to the Expected Case (SAP Table 2.10) which shows how, if WRLTH and SRLTH were in place, the level of VAC would be significantly lower - £11.50 in 2030 and £13.50 in 2040 – (in 2017 prices).

HAL's own analysis reveals the large numbers of people who will pay the charge:

- In the south-west local quadrant (inner Surrey), with airport expansion, despite significant investment in improving bus and coach services, and the imposition of a substantial VAC, public transport mode share only moves from 6% today to 12% in 2040 – i.e. 88% of people from the south west local quadrant continue to use private transport (road) to get to the airport – PTIR Volume 3 page 73 Graphic 58. This would result in 5,700 trips per day from the south west quadrant alone being required to pay the VAC.
- 47% of air passengers from south west London – 10,200 trips per day by 2040 – will drive to the airport and therefore must pay the VAC – PTIR Volume 3 Graphics 29 and 30.
- The Assessment Case shows that overall, 130,000 passenger vehicle trips per day will arrive at Heathrow by road by 2040 (SAP Graphic 2.35) - and therefore will be liable for the VAC.

The money which HAL will raise through VAC is therefore substantial. 130,000 passenger trips per day amounts to 65,000 VAC payments a day (as a trip out to the airport to drop off then return counts as two trips but only causes one VAC payment) by 2040. With a 2040 price of £50 this would yield for HAL in 2040 £3.25m per day or almost £1.2bn per year. This is a significant public policy matter which gains only six pages of mention in a SAP over 400 pages long. We think that when the scale and nature of HAL's VAC proposal becomes widely understood it will become a major reason for objection to HAL's expansion plans - unless there is a quality rail alternative in place to obviate the need for so many people to pay such a large VAC.

The Central London Congestion Charge received public acceptance as it functions in a place with well developed public transport alternatives. Its introduction was accompanied by TfL investing in improved public transport, along with public confidence that, since TfL was a public body, the money it earned from the charge was not going to be taken by shareholders as profit.

The hazard for HAL's proposed VAC is that for many locations in Surrey / Hampshire / south west London there is no viable public transport alternative to road despite HAL's plans to invest in bus and coach. This will cause resentment as there will be no practicable way for people in this area of the country to avoid the VAC.

For example the Guildford to Heathrow coach link launched in June 2019 operates only hourly, has a capacity of around 70 seats, runs with a scheduled journey time of over an hour, and is subject to delay due to motorway congestion. This is not sufficiently compelling to cause many of the 91% of Guildford residents who currently drive to Heathrow to switch away from their cars.

By comparison HSRL's proposed rail link will provide for Guildford two direct trains per hour with a capacity of over 1,300 seats per hour and with a journey time of under half an hour without congestion risk. HAL's own analysis suggests a SRLTH to Guildford would be used by 21% of travellers on this route, greatly improving Guildford's public transport mode share.

Our position is that it is only acceptable for a VAC to be levied once the SRLTH and WRLTH links are in place.

Q11: Do you have any other comments on our Surface Access Proposals

We would like to comment on staff travel. The Airports NPS Clause 5.17 requires that HAL must "include details of how, from a 2013 baseline level, it will achieve a 25% reduction of all staff car trips by 2030, and a reduction of 50% by 2040".

In the consultation material, HAL explains that this translates into a requirement to reduce car trips from 56,400 today to 23,000 in 2040 (SAP 2.6.33), bearing in mind that staff numbers are expected to increase from 72,700 in 2017 to 95,900 in 2040. To achieve the ANPS target needs a reduction in the proportion of staff driving to the airport from a reported 74% today (SAP 2.3.58) to 15% by 2040 (SAP 2.6.35). Looking at the figures, today public transport accommodates 26% of 72,700 staff = 19,000 trips a day or 7 million trips a year, and by 2040 it will have to accommodate 85% of 95,900 staff = 81,515 trips a day or almost 30 million trips a year, i.e. more than quadrupling volumes. The SAP is in our view deficient in not itemising how this can be achieved. It instead sets out some measures:

- A reduction in the number of staff car park spaces from 29,792 today to 11,600 in 2040 (SAP 3.3.60);
- Investment in improved/new bus services to 'hotspot' locations where large concentrations of staff live – but no analysis is offered of how this can be achieved on the scale necessary to move the volumes;
- Hearts and minds measures to appeal to staff to use public transport and adopt measures such as car sharing; and
- Making it easier to walk and cycle from shorter distance destinations.

We are doubtful that these measures alone will enable the fulfilment of the ANPS target because:

- We do not think that the bus network could possibly absorb over 20 million more journeys per year even with new routes and improved frequencies;

- It is unlikely that Piccadilly Line, Elizabeth Line and HEX have capacity to carry significantly more staff when they are also expected to carry an additional 20 – 26 million air passengers a year; and
- HAL is over-estimating cycling as a potential mode for staff – SAP Graphic 3.43 puts Hillingdon on the edge of a 30 minute cycling isochron. Hillingdon station is 8.4 miles from Terminal 5 which would require an average cycling speed of nearly 17mph, which we do not think is attainable by non athletes.

In our view, a SRLTH is required before there can be confidence that HAL can realistically achieve its NPS staff car trip reductions, when staff numbers are growing, in a way which enables the airport to continue to function in a viable way.

The SRLTH proposed by HSRL is extremely effective in serving colleague car driver hotspots, and can move large numbers of staff very quickly to the heart of the airport's terminals. For example, HSRL's scheme connects Heathrow with:

- Staines – four trains an hour taking just 6 minutes
- Feltham – four trains an hour taking just 14 minutes
- Ashford – four trains an hour taking just 9 minutes
- Hounslow – two trains per hour taking just 19 minutes
- Richmond – two trains per hour taking just 26 minutes
- Brentford – two trains per hour taking just 27 minutes

HSRL's proposed SRLTH will deliver 2,200 seats per hour in each direction on the route via Staines, and a further 2,600 seats per hour on the route via Woking, which will go a long way to accommodating the extra staff trips.

SRLTH is the compelling intervention necessary to achieve the staff car journey reductions on which expansion is conditional. We would be concerned that without such rail network improvements, it will become unviable for airport employees to live in south west London and Surrey, and therefore these locations will lose out on the employment opportunities which Heathrow expansion would otherwise offer.

Air Quality:

Q13: Please tell us if there are any other initiatives or proposals that we should consider in order to address the emissions from airport related traffic or airport operations

HAL's Heathrow Carbon Footprint Report from 2017 shows that 30% of Heathrow Airport's 2 million tonnes of greenhouse gas emissions each year arise from surface access. Switching some passengers and staff to bus or coach, overloading tube and existing rail lines, or hoping that more of the cars in use become electric are not sufficient to prove HAL's commitment. We think HAL needs to do much more to reduce emissions from surface access and that a HAL commitment to a SRLTH and WRTLH will give a much more credible edge to HAL's environmental stance.

Development Consent Order (DCO):

Q22: Do you have any comments on what we think will need to be contained in our DCO and do you have any views on anything else the DCO should contain?

We think that the DCO should contain a wider geographical assessment of the impact of expansion. The PTIR, for example, contains a lot of detail about public transport mode share and traffic volumes in the south-west local quadrant, but no data at all is shown for the south-west wider quadrant – which encompasses key towns such as Woking. This extra information should be provided to enable consultees to assess the detail of the impact of expansion on their areas.

We think that the DCO should contain more detail of the outputs from the Expected Case. In the Assessment Case, for example, we see that 129,950 daily vehicle trips occur by 2040, but nowhere does the consultation material explain what the equivalent figure would be in the Expected Case. Provision of this data would enable it to be clear how many vehicle movements are removed from the roads if the SRLTH and WRLTH schemes are in place.

General Comments:

Q23: Do you have any other comments in response to this consultation?

Regarding Surface Access, a DCO process will involve HAL having to prove to an investigation in public in front of independent inspectors, with cross examination from objectors, that their Surface Access Assessment Case is sufficient to deliver the requirements of the ANPS.

In our observation the SAPs and PTIRs show the answers to some quite high level 'exam questions' but contain no detailed explanation of the modelling methodologies or underpinning assumptions. This leaves us with a concern that the Assessment Case conclusions are 'solved' with answers arising from a modelling exercise, and have not been tested for their credibility or realism.

For example, HAL assert that a Vehicle Access Charge of £29 in 2040 leads to the achievement of a public transport mode share of 57%, but there is no explanation of the underlying data or methodology which has been used to arrive at this assertion.

We think that if HAL proceed to the DCO stage arguing that the ANPS requirements can be achieved without reliance on SRLTH and WRLTH schemes, the DCO is at risk of failing. This is because the current Assessment Case contains unrealistic assumptions about the ability of existing rail routes and coach to accommodate more passengers and staff, and is heavily reliant upon the hostile measure of a VAC which we think will be unacceptable to users.