

London Assembly Transport Committee Members  
Sent via email to [eleanor.haigh@london.gov.uk](mailto:eleanor.haigh@london.gov.uk), Senior Policy Advisor &  
Hannah Barlow, [hannah.barlow@london.gov.uk](mailto:hannah.barlow@london.gov.uk), Principal Committee Manager.

14<sup>th</sup> March 2025

Dear Eleanor and Hannah,

### **Heathrow Strategic Planning Group (HSPG) response regarding Heathrow's Surface Access**

We are aware that the Transport Committee is undertaking a review into Heathrow Surface Access, with a hearing planned on 27 March. Ahead of that session, please find some further detail from HSPG on this topic that we hope you find a useful contribution to the discussion and in drafting the following report and recommendations.

#### Who we are

HSPG are a constituted group whose eight local authority members<sup>i</sup> represent over a million people living in the immediate vicinity of Heathrow Airport. Our members include the London boroughs of Ealing and Hounslow. The group formed in 2015, with the aim of engaging constructively with Heathrow Airport Limited (HAL) to mitigate the impact of their operations on local communities, whilst also securing sustainable growth across the wider functional economic area.

This response has been prepared by the Partnership's secretariat, based on discussions in our Local Authority officer working groups and from agreed position statements prepared to inform our submission to the third runway Development Consent Order (DCO) application in 2020. It is worth noting that these positions are currently under review following recent announcements, however the key points made below on this topic are considered unlikely to substantively change.

#### Our position in a nutshell

Surface access arrangements for the airport are a priority area of interest for all our members because the traffic generated by it is the root cause of many of the issues of greatest concern for our local communities: namely congestion, poor air quality, carbon emissions and anti-social parking in neighbouring residential areas.

Congestion around the airport is a severe issue with roads used to access Heathrow airport the most congested in the country. Pre-pandemic, in the south-west quadrant of the M25 traffic volumes are at or close to capacity on all weekdays, with a 12-hour 'peak period' effectively lasting between 6am – 6pm<sup>1</sup>. Heathrow-related traffic was estimated to constitute as much as 9% and 16% of all traffic in the London Boroughs of Hounslow and Hillingdon respectively<sup>2</sup>. With the airport booming it seems unlikely that these percentages will have dropped in recent years.

There is therefore a clear need to improve on the existing situation, regardless of any airport expansion proposal, if national and regional targets on carbon reduction and air quality are to be met, and economic growth not constrained.

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<sup>1</sup> [Road Investment Strategy 2](#)

<sup>2</sup> [TfL Heathrow third runway: Surface access analysis](#)

Any additional traffic generated by airport expansion will have an outsize impact on a road network that is already highly stressed. To reduce the impact of expansion we believe the following surface access measures are required:

- Radical increase in access to the airport by train with full delivery of both Southern rail access and the western rail link to the airport.
- A southern road tunnel providing access to the Central Terminal Area from the south, with priority access provided for buses and cycles.
- Realising the airport's potential to be an integrated transport hub by:
  - delivering a Heathrow focused Bus Service Improvement Plan, which includes the comprehensive adoption of "turn up and go" frequencies on all buses serving the airport; widespread bus priority measures and; a ticketing offer integrated across rail, tube and bus operators inside and outside of London.
  - An ambitious coach strategy, with direct and frequent coach links from all the UK's major towns and cities.
  - An exemplar Local Cycling Walking Infrastructure Plan (LCWIP) allowing all airport employees living within 5km of the site ready access to airport opportunities by foot or by bike.
- Parking demand management measures which support use of sustainable modes and also incentivise the use of cleaner vehicles.
- A comprehensive airport parking zone protecting local residents from fly parking.

Underpinning all such provisions must be a robust system of green controlled growth that ensures that any increase in the intensity of the use of the airport must be dependent on achieving sustainable transport outcomes. This would also be consistent with the recent Luton and Gatwick airport DCOs, although any new DCO for Heathrow will likely need to go further than arrangements agreed for smaller airports given its uniquely constrained location and its status as the country's only hub airport.

### Our response in detail

**Congestion.** As stated in the Roads Investment Strategy 2 'It is evident that upgraded and new transport infrastructure will be required to support additional airport capacity'. An expanded airport needs to have an ambitious new surface access strategy if congestion is to be adequately addressed and mitigated. HAL and the Government should reaffirm their previous commitment to the mode shift targets set out in the Airports National Policy Statement (ANPS) and that the development should lead to no net road traffic increase.

TfL's 2018 analysis stated that 'to achieve no increase in (passenger, staff and freight) highway trips would require a public transport mode share of around 65-70% (up from around 46% presently). This could be expected to result in up to 200,000 additional airport trips by public transport every day (compared to 2018 levels), which for the most part will need to be accommodated by the rail links serving an expanded Heathrow<sup>2</sup>. We would expect HAL to work closely with TfL, National Highways, HSPG and other impacted local authorities to build on the work carried out as part of the DCO pre-pandemic to identify how much additional capacity on the network is needed, and how that might best be delivered in the light of wider policy goals to tackle congestion and improve the environment.

Congestion will worsen from the initiation of construction, with circa 10,000 workers on site<sup>3</sup>, causing inevitable local impacts and disruption. There needs to be adequate mitigation for local roads during major works on M25 and A4. There is also likely to be additional demand on public transport services in the area for a considerable period of time as workers travel to the site. HSPG is

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<sup>3</sup> [Phil Wilbraham, former Heathrow expansion director](#)

keen to ensure that appropriate transport is provided for these workers to travel to and from the construction sites. We also believe that any second order impacts must be considered (and where necessary mitigated), such as the likely increased demand for employment space across the sub-region arising from improved connectivity from an expanded airport, and the impact of relocating displaced businesses.

**Western and Southern Rail.** HSPG considers the delivery of the Western Rail Link to Heathrow and Southern Rail Access to Heathrow to be critical components of an expanded Heathrow Airport. A Southern Rail Access scheme would provide a direct rail connection to south London, Surrey, Hampshire and beyond while a western rail link would do the same for Berkshire and across the west of the country.

These schemes combined would contribute greatly to Heathrow realising its potential of being an integrated transport hub as it would connect London Paddington and west London directly with Surrey and Hampshire. This could deliver a welcome wider modal shift (beyond just amongst airport users) to rail from private cars, helping relieve a particularly congested part of the Strategic Road Network which is a key break on economic growth. An extension of the Elizabeth Line to Staines could also bring direct benefits to north east Surrey from investment at the airport, as well as growing the market more generally for this successful rail line, assisting in improving TfL's own financial sustainability in the process.<sup>4</sup>

Both schemes will crucially ensure that the economic benefits of an expanded Heathrow Airport can be unlocked and distributed equitably across the wider sub-region. HSPG consider the earliest possible delivery of these two rail schemes to be a critical element of a successful surface access strategy for an expanded Heathrow Airport.

**Highway Improvements.** A southern road tunnel providing access to the Central Terminal Area from the south, with priority given to buses and with measures to prevent through running by private cars, is deemed an essential part of any intensification of the use of the airport. This should also allow for cycle access, which would give greater travel choice for workers at the airport.

Clearly the realignment of major roads such as the M25 and A4 will have significant consequence on local road networks during construction and afterwards. Plans to implement these changes must acknowledge this, undertake a comprehensive process to establish potential local impacts and put in place sufficient resources to be able to mitigate those impacts. Best practice from other airports in the management of these issues includes the use of a transport mitigation fund, the governance for which includes direct representation from major impacted parties like neighbouring local authorities. Crucially this should be of sufficient size to fund both anticipated mitigation (e.g. identified as likely to be required through transport modelling) but also residual, unanticipated issues that may arise as new patterns of travel demand materialise on the network.

**Developing the Airport as an Integrated Transport Hub.** Heathrow Airport's economic pull can be seen in the Office for National Statistics travel to work area maps. The airport is the focus for employment and economic activity for many living in west or west-of London. However, governance structures and transport infrastructure do not reflect this reality – the airport is on the edge of everyone's 'patch' and at the centre of no ones. Greater engagement and co-ordination across the GLA boundary is a tangible action the Assembly could lead on to realise Heathrow's potential to develop as a sustainable transport hub.

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<sup>4</sup> Spelthorne Borough Council is currently reviewing their position on delivering improved access to Heathrow, having previously supported a light rail scheme linking T5 to Staines. This review is expected to conclude at the end of 2025. Other HSPG members have expressed support for the Heathrow Southern Rail proposal.

HSPG believes that new plans that lead to an intensification of the use of the airport could be a springboard to deliver an integrated transport hub that connects journeys across the sub-region, over and above airport related transport. This could have particular benefits for the heavily congested M25, M4 and M3 corridors.

There is an opportunity for more joined-up planning between operators, Heathrow, local and regional government to ensure that all components of the public transport system are developed to maximise the positive impacts of an improved, integrated network. This is particularly the case for the significant number of residents living in our communities to the west of the airport who, despite many of the initiatives introduced recently by HAL, still have limited options in accessing the airport other than by car. Measures that are necessary include:

- Delivery of the aforementioned western and southern rail access schemes.
- Enhancements to the local bus network, through the delivery of a Heathrow focused BSIP. In particular ensuring that all buses operate at “turn up and go” frequencies and a comprehensive range of bus priority measures is also delivered across the sub-region.
- The development of a ticketing offer at Heathrow to achieve more seamless, integrated ticketing between bus operators from both inside and outside of London, and between buses and other modes such as rail and London underground.
- Enhancements to the network of walking and cycling networks to and around the airport – delivery of an ambitious LCWIP.
- An ambitious coach strategy, with direct and frequent coach links from all the UK’s major towns and cities.
- Demand management measures such as drop off charges, respecting the existing cap on parking numbers introduced by T5, a progressive parking management policy applied to both colleagues and passengers incentivising the use of cleaner vehicles.
- A comprehensive airport parking zone protecting local residents from fly parking by airport users, including taxis and private hire.

**Funding.** Funding of infrastructure is a significant issue and with Government funding constraints likely to remain tight for a number of years, there is a need to be flexible and innovative in finding ways to generate the necessary finance to support the interventions needed to deliver expansion. Airports offer unique opportunities to leverage private sector funding, at a percentage far higher than the National Infrastructure Commission has suggested for transport, potentially at around 20% private financing.

Nevertheless, experience suggests that even this is insufficient to deliver the most transformative schemes, such as the strategic rail interventions set out above. HSPG suggests that Government should consider a specific fund to unlock this type of investment and look to create a network of airport based national integrated transport interchanges, that will support both airports and wider transport integration policies and aspirations.

Whilst wishing to see a firmer commitment from Government on the funding and delivery of transport infrastructure, HSPG accepts that Government funding should not be the only focus, funding from the private sector and Heathrow will be key to delivery of many infrastructure enhancements such as strategic rail access,

HSPG would like to see an approach to funding similar to that put forward as part of the DCO submitted for the expansion of London Luton Airport. As part of this application, it is proposed that a Sustainable Transport Fund (STF) is established, with funding generated from a levy on passenger car parking (short, mid and long stay) and passenger drop-off. The monies generated can then be used to fund interventions in and around the airport, aimed at mitigating the impact of expansion, and improving sustainable travel options. Similar such levies are already in place to varying degrees at Gatwick, Stansted and Birmingham airports, and proposed at London City. If this approach is got right, it could also provide a revenue stream that could be borrowed against to support the financing of wider interventions, including the rail enhancements. Importantly the governance of the use of these funding streams must include direct representation from impacted local authorities.

### Conclusion

As a representative body of local authorities with a huge stake in both the success of the airport, but also in mitigating the worst of its impacts on its neighbours, we welcome the opportunity to put forward our views into this important discussion. We are happy to discuss the points above with committee members further if helpful, and look forward to seeing the findings the committee draw on this important topic.

Yours sincerely,



**Mark Frost, Associate Director Heathrow Strategic Planning Group  
On Behalf of HSPG members**

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<sup>1</sup> Full Members of the HSPG (and signatories of an 'Accord') are: Elmbridge Borough Council, London Borough of Ealing, London Borough of Hounslow, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council, Royal Borough of Windsor & Maidenhead.

Other organisations have 'Observer' status and participate in some activities, including: various Government agencies, National Highways and the West London Alliance (of London Boroughs) and London Borough of Hillingdon, The Group works closely with Heathrow and airport stakeholder groups such as Council for Independent Scrutiny of Heathrow Airport and Heathrow Area Transport Forum.