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Dear Mr Holland-Kaye

Whatever one's view of Heathrow expansion, it is clear that there have been few Development Consent Order (DCO) applications of this scale, both in terms of their delivery and their impacts. Heathrow Airport Limited (HAL) therefore has a particular responsibility to ensure that it is presenting a comprehensive and accurate assessment of the impacts and can offer a credible, evidenced strategy to deal with these.

After a year of engagement with HAL, I am disappointed that it has fallen short in doing this. The number of HAL-TfL meetings which HAL lists is sadly no indication of the quality of the engagement. HAL has largely not responded to issues we have raised, often repeatedly, and shows little indication that it is genuinely committed to resolving them or working towards a statement of common ground.

As such, these issues still persist in the DCO consultation material now published. HAL has set out an assessment which is significantly flawed in a number of regards, not least several of the underpinning assumptions; understating the impact of its proposals on Londoners and showing itself unwilling to take on board our guidance.

HAL is forecasting an increase in demand which equates to over 130,000 additional daily passenger and staff trips on surface access networks, an increase of over 50% on today. But if this is to be accommodated in line with HAL's 'no more highway traffic' pledge, this would entail a 170% increase in daily trips on public transport—presenting a considerable challenge both to encourage that degree of mode shift and then accommodate the resultant flows.

Yet, key elements of its strategy for dealing with the surface access and air quality impacts lack credibility and remain unevidenced. As such, HAL has yet

to demonstrate how the mode share targets in the NPS and no extra traffic pledge are achievable and how it will comply with its air quality obligations.

In particular, HAL continues to claim that neither Western Rail Access (WRA) nor Southern Rail Access (SRA) are required for expansion – but it cannot provide a credible explanation as to how it will attract passengers and staff to the south and west out of their cars without a fast, reliable public transport alternative. Certainly, local bus and coach services are no substitute, particularly in the absence of priority infrastructure on the key corridors to avoid worsening journey times and reliability. As such, HAL's reliance on more buses and coaches is simply not credible. Nor is HAL committing to the high quality infrastructure which could encourage walking and cycling, particularly for staff.

HAL relies heavily on pre-existing schemes such as the Elizabeth line (Crossrail) and the Piccadilly line Upgrade – both of which planned on the basis of a non-expanded Heathrow – and this undermines the ability of these schemes to deliver their original objectives to support London's housing and growth. The reality is that there is currently a funding gap for the Piccadilly line Upgrade, which means that the signalling upgrade, which unlocks an additional 41% capacity, is not committed and so cannot be relied upon.

There are also fundamental concerns about HAL's proposed low emission zone and road user charge. No evidence has been provided to justify their charging level and geographical scope, nor to demonstrate their potential effectiveness. The exclusion of staff and freight traffic is particularly inexplicable, and indicates that they are not serious about addressing the air quality problems in and around the airport. Nor is it clear why the road user charge has been set below the £40 identified in analysis by the Airports Commission. In addition, no analysis has been offered as to how to mitigate the impacts of people who will seek to circumvent the charge on areas outside of the airport boundary.

HAL's parking strategy is deeply flawed. For passengers, it is looking to increase parking spaces by around 90%, consolidating it at two new sites directly off the motorway network, with rapid onward links to the terminals. These would be, by some margin, the two largest car parks in the UK (with over 20,000 spaces each), and the access would make them significantly more attractive than today. This additional supply is entirely at odds with reducing car trips to the airport. HAL's plans to confiscate staff parking could discourage car use, but will be highly challenging to deliver. Only 10% of airport staff are employed by HAL, and many of these parking spaces are on long-term leases and enshrined in staff contracts.

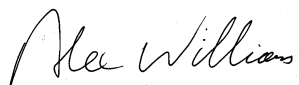
There are a wide range of concerns about the modelling and the underpinning assumptions. The latter include incorrect rail frequencies, a tripling of car-sharing trips, freight growth forecasts which do not take account of aircraft size, and a very slow phasing of demand. The highway model is, by HAL's own

admission, not yet fit-for-purpose, nor compliant with DfT WebTAG criteria; and this calls into question the robustness of both its surface access and air quality results. Even with these flawed assumptions, HAL's own assessments show there would be at least one exceedence of legal limits for air pollution as a result of the increased traffic associated with expansion. Our regular attempts to engage with HAL about the multiple concerns about its assumptions have been met with an unwillingness to take these on board or set out meaningful steps to address them. It was symptomatic of this lack of serious engagement when I was told by HAL for the first time, at our meeting on 10 May 2019, that its modelling and analysis to be presented in this consultation – and so the underpinning assumptions – had already been “locked in” in November 2018.

HAL seeks to address concerns about the impacts through its proposed “Environmentally Managed Growth (EMG)” framework, but the mechanism it outlines for being held to its pledges is flawed. In particular, HAL draws the monitoring boundary so tightly that it excludes a number of key trip types, including freight trips to nearby consolidation centres and “kiss and fly” passengers dropped off outside of the access charge area. Currently the EMG framework is unfit for purpose, substantially understating the actual highway trips associated with expansion.

HAL has so far failed to provide assurance that an expanded Heathrow can avoid dire impacts on London, on its surface access networks and on its air quality. If HAL expects to be taken seriously as it brings forward its DCO then it needs to demonstrate that its modelling of the impacts is robust and that it has a credible strategy for addressing those impacts. It cannot ignore the issues raised, nor can it avoid reconsulting once it has updated its work, given the substantial implications of the matters to be remedied. We are ready to continue meaningful engagement with HAL but not on the basis of wishful thinking – it must be founded on assumptions, methodology and evidence which are capable of withstanding independent scrutiny.

Yours sincerely



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