



Response to consultation on scope of Outcome Based Regulation Mid-Term Review – Letter dated 25th April 2024

Heathrow Southern Railway Ltd, the promoters of a scheme to provide Southern rail access to Heathrow, welcomes the opportunity to respond to this consultation. Our proposal provides rail access from key airport catchments which are currently reliant on road, dramatically reducing the very significant environmental impacts of surface access.

We are therefore pleased to note the *“the definition of a measure relating to Heathrow’s carbon footprint (is) a priority for the review.”*

Our response to CAP2618 (attached) noted *“the CAA’s wider environmental sustainability strategy”* acknowledges that *“for the (aviation) sector to continue to provide accessible, competitive and sustainable services to consumers, significant and sustained progress will be needed to improve its environmental performance in relation to emissions, noise, air quality and other adverse impacts.”*

We suggest that is highly relevant in considering measures that help define *“an airport that meets my needs,”* particularly when the CAA’s Sustainability Strategy confirms its research *“indicates consumers tend to consider carbon before noise.”*

In 2023 the Government’s call for evidence on the 2040 zero emissions airport target confirmed *“that airport operations should include infrastructure that supports surface access (e.g.... railway stations)”* and sought views on how best to include this infrastructure within the target for all airport operations in England to be zero emissions by 2040.

We therefore trust the review will specifically consider the carbon footprint of Heathrow’s surface access and confirm we would be pleased to assist in any way appropriate.

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