



Windsor Link Railway Ltd

Gainsborough House

59-60 Thames Street

Windsor

Berkshire SL4 1TX

01753-202690

www.windsorlink.co.uk

Sir Howard Davies
Airports Commission Consultation
Freepost RTKX-USUC-CXAS
Airports Commission Consultation
PO Box 1492
Woking
GU22 2QR

3 February 2015

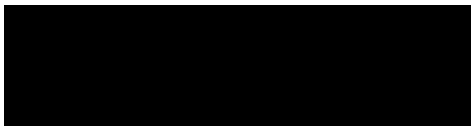
Sir

Re: The Windsor Link Railway (WLR) – feedback to the Commission

Please see attached WLR's feedback to your consultation. As a railway company building our first link in Windsor, we have focussed on the severe surface access issues, particularly with expanding Heathrow. We respectfully submit that our proposals offer a flexible and resilient solution whichever option is selected.

Please don't hesitate to contact me if you have any questions.

Yours sincerely



Managing Director



@windsorlink



[Redacted]



bee.net1



[Redacted]



[Redacted]

Question 1: What conclusions, if any, do you draw in respect of the three short-listed options?

WLR believes that the options suffer from particular challenges in surface access which have not been adequately addressed by the Commission. This should have been modelled by the Commission before presenting the options as it is impossible to offer an informed view on these without considering the problem of how the airports customers will travel to the new or enlarged airport and their experience.

This particularly applies to the near doubling of passenger numbers that is forecast for an expanded Heathrow. It is not realistic, as Heathrow Airport implies, to expect the currently proposed rail links to absorb this. Access to Reading and the west is forecast to take a few hundred thousand passengers per year. Crossrail will bring many more carriages (but essentially the same service as today) from London. These combined will not accommodate the many millions of extra passengers and therefore great pressure will be placed on the roads surrounding Heathrow, particularly the M25, M4 and A4, as well as local roads in surrounding towns such as Slough and Windsor, all of which already have severe capacity problems.

The Commission has taken too-narrow a view of surface access, looking only at the problem of getting to the airports, not the wider context of the airports' surroundings.

The Commission is quite right to have said that regardless of whether Heathrow is expanded a southern rail link from this airport is required. However, even this is likely to be insufficient if Heathrow is expanded. Severe gridlock, which is already a regular feature, will severely limit its future success and the whole point of expanding. Therefore better rail access is required than has been proposed.

WLR regards the Heathrow Hub option, which includes moving the Great Western Mainline, as the most challenging option from the rail access point of view. In construction terms it conflicts with the proposed link from Heathrow to Reading via Slough as the new runway will be over the tunnel route. Although this is not insurmountable, the ground conditions, consisting of gravel pits and landfill, may make what is already the most expensive railway link in the world more expensive still. A fourth runway would also conflict with the existing line to Windsor.

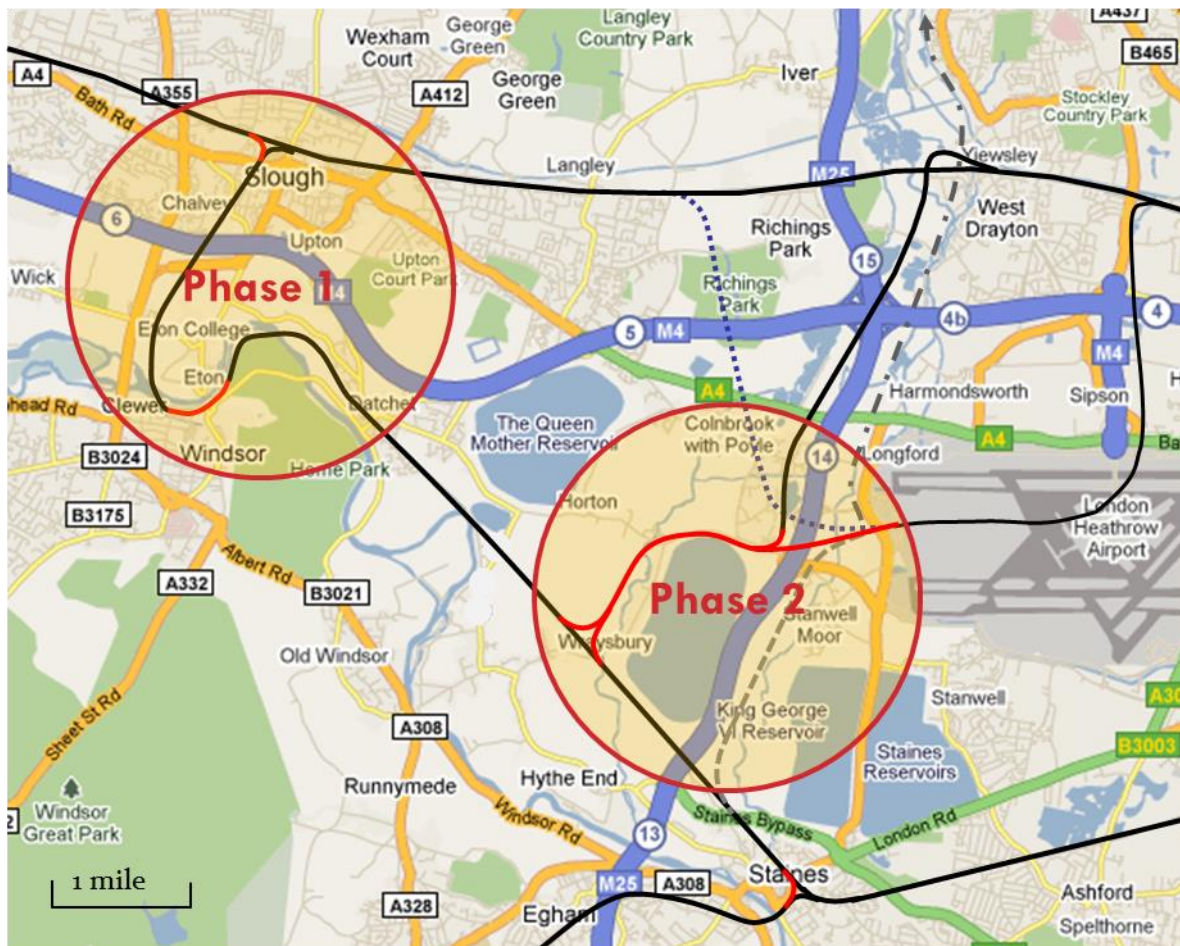
The other problem with the Heathrow Hub option is that whilst the proposed new interchange appears close to Heathrow, when looked at on a map of the south-east of England, it is actually still quite a distance from the airport. The proposal effectively includes another new train service to connect from the rail interchange to the terminals. A rule of thumb is that obliging passengers to change trains effectively halves the demand at each occasion. This means that the passenger forecasts for this solution are likely to be dramatically less than other more direct rail connections. It would also mean Heathrow would compare poorly with other hub airports such as Charles de Gaulle, where TGV trains go direct to the airport.

The north-west option also conflicts with the proposed link from Heathrow to Reading, with the western end of the runway going just over the proposed tunnel route. The proposed new terminal buildings will also complicate construction. The distance from these buildings to the rail terminal will further decrease the passenger experience.

The Gatwick option is probably the best from the surface-access point of view with that airport already having a less congested road network and being the easiest to access to access from London. Its access from elsewhere on the rail network is an issue.

Q2: Do you have any suggestions for how the short-listed options could be improved?

Yes, all three options would benefit from phase 2 of the Windsor Link Railway being built. This is illustrated on the following map:



Black lines above show existing railways. The dark blue dotted line shows the proposed north-west link, Western Rail access to Heathrow (WRATH). The grey dotted line shows the previously proposed AirTrack Route to the south-west. The red lines are the Windsor Link Railway's proposals, split into two phases.

This solution is superior to all the surface access proposals made by the promoters of the short-listed options. The reason for this is that it is an integrated transport solution for the region, rather than a solution for Heathrow in isolation. Heathrow is not isolated from its immediate surroundings and treating like this is partly the reason that the AirTrack solution failed and why the WRATH scheme has still not been officially approved, conditional on it demonstrating a positive business case.

The Windsor Link Railway has already fed back to the Great Western Route Study, to say that the rail transport industry needs to learn from the computing industry regarding designing fast and resilient networks (see attached paper) by improving *mesh connectivity*. Similar principles should also be

applied to considering Heathrow surface access. That is, rather than treating Heathrow as a point destination that needs better connectivity, as WRATH and AirTrack have, it should be considered as just one of many nodes that all need to be better connected to each other.

Applying this thinking to WRATH and AirTrack (or its successor) it is clear that they only make sense if they are considered in isolation from each other. When the wider problem of network connectivity is considered, it is clear that they are just very expensive solutions for only a fraction of the problem when what is needed is a comprehensive vision. Worse, the additional strain that these point-to-point solutions put on already over-loaded routes such as the GWML or the Windsor Lines is likely to lead to great unreliability such that the benefits of the additional connections are likely to be outweighed by the dis-benefits.

WLR's vision is for a network similar to the following:



This approach works towards what could be considered a railway M25, addressing the problem that whilst radial links to London are relatively good, orbital links in the region around Heathrow are currently almost non-existent and mean road travel is essential for such journeys.

As can be seen, the above **not only** provides better connectivity to Heathrow from a greater number of towns **but also** provides better connectivity between these towns to each other. It is therefore likely to have a much better business case than links to Heathrow alone. The relative business cases for phases 1 and 2 of the WLR are covered [here](#).

A few other advantages are worth mentioning. The first is that the WLR would also provide better freight connectivity to Heathrow, especially by rail. This is because it would link in with Colnbrook branch and the proposed freight terminal there, providing a new link to the south. Again, this would not just benefit Heathrow but also freight connectivity throughout the region.

Additionally, as the HS2 branch to Heathrow is not now favoured, the southern link as proposed would provide a link for millions of people in the south to the proposed HS2 terminal at Old Oak Common. Once more, this would not just make a material improvement to the business case for HS2, it would also be of great benefit to Heathrow to be a station on this route.

Regarding Gatwick, the WLR proposals are also better if this option is selected, meaning that Heathrow would have a competitor. This implies that there would be even greater need than at present for better links between (a) the airports for interchange passengers and (b) between towns in the west and Gatwick. Phases 1 and 2, provide significantly cost-effective options for connecting Heathrow to Gatwick via a variety of routes, which could be supplemented by faster routes in the longer-term.

Finally, good mesh connectivity not only provides better resilience to random and deliberate harm to the network on a day-to-day basis, it also provides better resilience to changes in political priorities. For example, if the politicians first decided not to accept the recommendations of the Airports Commission but later changed their mind, the WLR solution would accommodate this better than any other. In fact, it is the only surface access proposal that is consistent with all three shortlisted options as well as many others.

Q3: Do you have any comments on how the Commission has carried out its appraisal?

Yes, as stated in Q1 above, the surface access considerations should have been modelled in greater detail before this stage and not in isolation from the context of the airports' locations and the needs of surrounding settlements.

This not only applies to the three short-listed options but also to those that did not make the first sifts. For example, the Goodwin Sands proposal had a very good surface transport case that seemed to be completely ignored when it was lumped together with the Thames Estuary proposals, which had significant problems in this area.

As another example, the Foulness proposal was rejected because of the difficulties of moving the MoD site there. However, the much more significant problems of moving the M25, M4, the spaghetti junction between them seem not to have featured in allowing the Heathrow options to proceed, which suggests bias. In the case of the north-west option for Heathrow, the fact moving this infrastructure was a completely unviable thing to do has been proven by the fact that very shortly after making the short-list, Heathrow was allowed to change its submission, moving the new runway closer to the existing ones. This was a material change that significantly downgraded the capacity and flexibility of the proposed expansion.

This is not to say that the Commission has necessarily made the wrong decisions in its shortlist. However, the absence of a fair, unbiased and rigorous process for considering surface access means first that we cannot say for sure that the correct options have made the shortlist and second that we lack a proper basis for comparing them.

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

Yes, heritage and tourism. The Windsor Link Railway is not only a scheme for improving railways but also for restoring many towns in the region include the Windsor riverside.

The Commission has considered small listed structures that may be physically lost due to airport expansion. It does not appear to have considered sufficiently the effect on heritage assets in the flight paths, most notably Windsor Castle and Eton College.

Windsor and Eton currently receive about 7 million visitors per year and both are internationally recognised, icons of Britain and her culture. It would be ironic if that by expanding Heathrow, we damage one of the main reasons that so many people visit.

It is likely that both institutions and their current functions will be substantially harmed by the large increase in noise proposed, perhaps to the point where either or both cease to function as currently.

‘Substantial harm’ is a test used in planning legislation for normally rejecting an application.

Flooding is another issue that has not been adequately addressed. Last year saw the biggest floods in the region since 1947, with many people still unable to move back since. The problem was particularly bad in the villages near Heathrow in the Colne Valley. Building a new runway is likely to make this problem significantly worse, not just for these villages but potentially for large towns both up and down-stream.

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission’s 16 appraisal modules), including methodology and results?

Yes, regarding surface access in particular, as covered above.

Q6: Do you have any comments on the Commission’s sustainability assessments, including methodology and results?

Yes, it seems that the sustainability assessment has not included heritage damage in Windsor & Eton.

Q7: Do you have any comments on the Commission’s business cases, including methodology and results?

No, except as above.

Q8: Do you have any other comments

Just to say thank you to all who are working for the Commission and their efforts to make this country better.