

29TH May 2026

HEATHROW PASSENGER FORUM – H8 SUBCOMMITTEE

SUBMISSION FOLLOWING THE PUBLICATION OF THE H8 INITIAL PROPOSALS BY THE CAA AND THE SUBSEQUENT 4TH ROUND OF CONSTRUCTIVE ENGAGEMENT

Dear Selina

Thank you for seeking our additional input based on the published CAA Initial Proposals (IPs) and the subsequent 4th-round of constructive engagement sessions.

Ways of Working

We found this round of constructive engagement particularly useful, and we attended 3 of the 4 that were most relevant to the passenger. This was an opportunity to have deeper, more productive interactions with the airline community, resulting in our holding an additional session with the airlines only.

We held a deep dive into five key areas over two sessions with HAL and CAA representatives.

The topics we prioritised were: extra care (PRS/PRM), baggage, terminal & security experience, resilience and sustainability.

Meeting Dates

Tuesday 14th April: “*Overview of CAA IPs & Overarching Issues*”. CAA, HAL, Airlines, HPF (**Mark Izatt, Sarah Denyer, Ivan Dubovsky**). In person.

Tuesday 21st April: “*Service Quality & Incentives*”. CAA, HAL, Airlines, HPF (**Mark Izatt, Ivan Dubovsky**). In person.

Tuesday 28th April: “*Capex, Capex Governance & ORC*”. CAA, HAL, Airlines, HPF (**Mark Izatt, Ivan Dubovsky**). In person.

For Public Use

Monday 11th May: “*HAL Focused Constructive Engagement*”. HAL, CAA, HPF (**Mark Izatt, Sarah Denyer, Geraldine Lundy, Lorenza Porciello, Margaret Devlin, Ivan Dubovsky**). In person.

Monday 11th May: “*HPF Only Discussion on IPs and Engagement Sessions*”. (**Mark Izatt, Sarah Denyer, Geraldine Lundy, Lorenza Porciello, Margaret Devlin, Ivan Dubovsky**). In person.

Tuesday 11th May: “*Extra Care & General Discussion*”. AOC, British Airways, HPF (**Mark Izatt, Sarah Denyer, Geraldine Lundy, Lorenza Porciello, Margaret Devlin, Ivan Dubovsky**). In person.

Monday 17th May: “*Sustainability*”. CAA, HAL, HPF (**Mark Izatt, Sarah Denyer, Geraldine Lundy, Lorenza Porciello, Ivan Dubovsky**). Virtual.

Consumer Priorities

HPF supports the six consumer priorities identified by Steer on behalf of the CAA. However, based on the consumer evidence we have reviewed, we believe a critical priority is absent: **sustainability**. We believe this should be recognised explicitly as the seventh consumer priority in the CAA Final Proposals. This is an area which will only escalate throughout the H8 period as society pushes to ‘square the circle’ between flying and sustainability.

More broadly our overarching concern is the absence in the IPs of how consumer priorities have fed into the decisions the CAA has taken, and how Heathrow would, as a result, be able to deliver against them in H8, given that most of the capital and OPEX items specifically designed to deliver against the consumer priorities are below the threshold. However, we recognise that the CAA is setting the envelope and not directing specific investments.

With much of the airport already operating at or near capacity, we are concerned that service levels may deteriorate during H8 rather than improve, which is not in consumers’ interests.

Ahead of the final proposals, we urge the CAA to revisit its capital prioritisation framework and OPEX decision-making to ensure that appropriate weighting is given to initiatives that deliver against these seven consumer priorities—and to hold Heathrow to account for delivering them in the interests of consumers, not just their shareholders.

We acknowledge that it is a sensitive balance between a passenger charge which ensures affordability to the consumer and a passenger charge that ensures that passenger service expectations are delivered.

Extra Care (PRS/PRM)

We support HAL's ambition to implement a much-needed, transformative, high-impact shift in relation to accessibility, but note this has not been supported in the initial proposals, which we believe poses a significant challenge to delivery and to providing vulnerable consumers with the experience they deserve. Whilst the IP supports the fundamentals for those passengers with physical disabilities, those aspects which would enable the airport to keep up with leading airports in terms of accessibility and ensuring it is fit for the future were not. The extra care community is growing in number, and their needs are changing and airports need to keep up.

Work on this journey is already underway, but if adequate funding were provided in H8, this could move at pace and with greater certainty. We noted that some of the programmes were not fully mature and/or aligned with passenger experience rather than compliance so they were not rated highly in the CAA's capital prioritisation, which we feel is wrong, as this was one of the Steer-identified consumer priorities for H8. We therefore welcome the work underway to develop more detailed business cases, and we expect HAL to also focus on relevant compliance in their response, including in relation to ECAC Document 30.

Our concern is that if the additional initiatives are not supported, the airport would offer only a basic PRM service and would not meet the needs of those who require a different kind of assistance. The reputational risk to the airport and to 'UK plc' through falling behind other comparable hubs, and the financial risk of the current assistance model being unsustainable due to the projected increased demand from PRS, is a concern.

We believe that, when it comes to targets, satisfaction, and MTI triggers, the extra-care passenger and non-extra-care passenger cohorts should be at the same level. We reject anything that results in two-tier delivery. All passengers are equal.

The possibility of retaining the PRM target as reputational, leaving the financial aspect to the service provider contract, was discussed. A concern was raised that the contract's focus was solely on wheelchairs, and we question whether the correct variables are being measured. Recognising that people who did not require a wheelchair were requesting assistance as there was no alternative, the focus should be on designing a more tailored service.

We welcome greater collaboration between the airport and the airlines in this vital area and call on the CAA to ensure that Heathrow is held to account in H8 to deliver these essential improvements as soon as possible, rather than the delays we saw in H7.

We also note that there are opportunities such as floor markings, technology and sensory rooms which have lower investment demands, but which can have material impact on experience.

The CAA's own paper CAP 1629 "*Supporting people with hidden disabilities at UK airports*" recognises Heathrow's use of quiet rooms around terminals allowing passengers to avoid the sounds and disturbances often associated with busy terminals. We see this as best practice.

Baggage

Whilst the CAA has recognised the need for baggage-related asset renewals, the reduced capital envelope and OPEX overlay proposed significantly increases the likelihood of interruption to flow, given that systems are already operating at capacity, as it would not allow for modernisation. This would likely impact resilience. The collaborative work undertaken with other airports regarding what a future baggage system would look like was discussed, together with the fact that Heathrow was alone in offering highly bespoke sortations on behalf of some airlines to ensure that passengers were reunited with their bags more quickly downstream, which, while contributing to system congestion, did represent a benefit to the passenger. We have suggested that HAL should either charge

more for this service or communicate it as being a differentiation which justifies its higher passenger charge.

We have noted that the airline community has been supportive of the CAA's IPs to introduce a financial rebate within the MTI framework, linked to the timely delivery of departing bags, in order to strengthen incentives for improved performance and resilience. But, especially in the context of the most recent outages, we are concerned that the proposed target of 98% for timely delivery would fail to provide adequate incentive to Heathrow and should potentially be increased alongside a triggering mechanism in the event of a major system outage. However, more stringent criteria must be paired with adequate capex and OPEX investment in systems to make this achievable, but this must be assessed against the flexibility that Heathrow currently provides airlines to ensure bags have a greater chance of travelling with their owner.

We used this further engagement to challenge HAL on how much new technology, and AI (including agentic AI, robots, humanoids) they are considering. Using innovation to anticipate future demand and issues.

Terminal Improvements & Security

Alongside the key consumer priorities in their initial proposals, the CAA also specifically called out walking distances, wayfinding, and seating availability as elements consumers wished to see improved during H8, which the HPF supports and considers as 'basic experience'. But then the CAA goes on to only support five 'basic experience' initiatives; one helping passenger flow, and nothing for enabling enjoyment, thus not delivering against the consumer priorities. Without this investment in capacity, service would undoubtedly deteriorate as passenger numbers continue to increase, impacting performance.

Seating is a basic passenger expectation, not a discretionary extra. We therefore believe there is a strong case for reintroducing an MTI measure to ensure Heathrow gives sufficient priority to seating provision over revenue-generating use of space.

That said, we recognise that rising passenger volumes during H8 will place any such measure under significant downward pressure, particularly if capital investment in space and seating remains constrained. For that reason, any target would need to be carefully calibrated and potentially phased, with a realistic milestone set for achievement by 2031.

From a passenger perspective, Terminal 5 must be a central focus in H8. It is Heathrow's most congested terminal and records the lowest satisfaction levels, yet the CAA has proposed deferring T5 optimisation phase two into the long-term development stage linked to expansion. We do not believe this is in the passengers' interests. There is no certainty that expansion will proceed, nor that it will do so to a timetable that delivers the capacity needed by 2032. Without further investment, comfort, reliability and punctuality will decline. Phase one alone will not deliver the satisfaction improvement that passengers are demanding. We therefore urge the CAA to scrutinise all Terminal 5 business cases carefully and ensure Heathrow has both the planning and the delivery mechanisms required to move forward at pace and provide the capacity passengers will need by 2032, thus avoiding the risk of stranded assets.

We remain concerned about the passenger experience in Terminal 3 under the current IPs. Projects to reduce congestion in the Departure Lounge and improve conditions at the piers and gate rooms have not been included, despite clear evidence that these are current passenger concerns. Based on the consumer evidence we have reviewed and our discussions with Terminal 3 airlines, we do not believe this is in passengers' interests or consistent with the consumer priorities identified for H8. We therefore urge the CAA to reconsider the impact these omissions will have on the passenger experience. The ongoing terminal occupancy review will, of course, deliver short-term respite, but based on the H8 passenger forecasts, this looks unlikely to meet the passenger demand by the end of H8 and beginning of H9.

Walking distances, wayfinding and seating availability are issues which apply to every passenger, and especially those who require extra support. Improvements following the best Universal Design practice would represent a relatively lower cost way to encourage

some passengers to maintain their independence thus reducing reliance on assistant services.

In relation to security, we remain supportive of Heathrow's short lane model which offers more lanes and greater resilience against asset failure or other incidents. And we agree with the airlines' support of using installed technology to track queuing and flows.

Resilience & Asset Replacement

During our deep dive, HAL provided a recap on the 650,000 diverse assets under their management. Those which would be reaching the end of life in H8, the cumulative rollover across regulatory periods, and the asset resilience trend since the pandemic.

We discussed the relationship between CAPEX, OPEX, MTI's and asset replacement. The CAA's IPs support 60% of the projects in the business plan, but recommended a 50% CAPEX reduction without a commensurate increase in OPEX, thus requiring the airport to balance this scenario without negatively impacting passenger service. It was further noted that whilst 60% had been supported, the value attributed was substantially lower than what Heathrow believed it actually needs. We also noted that £75m was now required for emergencies and spares, with £22m allowed and £12m requested for minor works (repairs beyond the maintenance team), with £0 allowed. This removed the safeguard that was currently in place. Unlike in previous regulatory periods, in H8, the airport would not be able to keep everything functioning, and failures impacting service and performance were already being seen. This has left us concerned, and we believe the CAA needs to do further work to ensure that the capex and OPEX envelopes are sufficient to ensure that Heathrow can continue to meet the MTI targets.

During our final session with HAL they raised a critical radar replacement issue which brought home to us the danger of underfunding, what is critical national infrastructure.

From a passenger impact it is worth recognizing that even relatively short outages can have a significant and material impact on their travel experience. The recent baggage issues at T5 provide an extreme but important example where passengers were without their luggage for over a week.

Sustainability & Community

In general, Steer has given considerably lower ratings for ‘impact’ and ‘likelihood’ across the topics of heat decarbonisation, noise, EVs, waste and surface access. We recognise that, with many calls on the funding envelope, deprioritising these areas of delivery is tempting, but it is also very short-termist. Societal pressure to reduce carbon, waste and the impact of noise will only increase, and we support initiatives which allow the airport to keep up with its peers and wider industry and government policy.

Prioritisation Within “The Envelope”

We understand the CAA’s view that they are responsible for setting an envelope for capital and OPEX investments, but are concerned that, in isolation, this doesn’t act in the best interests of consumers, as once set, how the envelope is spent, we would encourage the CAA to put in place regulatory mechanisms to ensure that Heathrow has to ring-fence funds to deliver against consumer priorities.

During our discussions on critical assets, we reflected on how helpful it would be to separate out critical (no debate) projects to show what funding remained to cover the remainder of the renewals/improvements within the envelope. Moving on from ‘the ask’ including everything, to building up a revised plan where the foundations are the essential items and so forth. With consensus on priorities and then passenger charge ‘banding’ (the higher the charge, the more the delivery pyramid could be realised) we believe this would help focus the discussion – eg “an extra 50p of charge per passenger could deliver X improvement”.

Capital Governance

As we set out, in our response to Heathrow Business Plan, we still believe it is critical that the CAA introduces a consumer voice into the Capital Governance process to ensure that investments delivering against the consumer priorities are prioritised over Heathrow and airlines’ financial returns although ideally the process would deliver against both needs.

At the conclusion of our session with HAL they advanced some helpful thinking on how to incorporate the passenger voice throughout the process going forward. The aim of this would be to achieve better outcomes for passengers without introducing unnecessary complexity or oversight. Perhaps via a quarterly portfolio review. This would align with other CISHA activities related to the ongoing scrutiny of the Noise Action Plan and the Sustainability Strategy. The HPF has committed to exploring how this could work, but we are very supportive and would welcome further discussion with the CAA and the airlines about how we can work together to advance consumers' interests during H8.

Reflections

During this stage, we returned often as a group to the importance of;

- **Greater transparency with stronger arguments** so facts can be established and agreed upon by all stakeholders earlier in the process.
- **Earlier alignment by all parties** on critical investment to remove those items from the debate.
- **Regular and collective prioritisation** sessions to better understand the trade-offs and consequences of decision-making.
- Regulatory reform needs to consider options which encourage a more **collaborative approach** between airport operator(s) and airlines.
- **Evaluation methodology needs to be more skewed towards innovation**, proactive risk management, and responsive to societal and consumer trends, such as sustainability. By prioritising proven responses to mandatory requirements, the CAA makes experimentation and 'soft' customer satisfaction harder for HAL.
- **Transparency of the passenger charge** in its total and how it is distributed across the areas the passenger experiences (the obvious ones and the invisible ones) together with societal (sustainability) and community (noise) would improve understanding and make charge benchmarking more realistic in the context of consumer knowledge and decision making. For example – “Do I fly from the airport which I know does more to reduce carbon emissions which I help fund?”

We hope our response is useful and thank you and your team for assisting us during the process.

Yours sincerely

MARK

Mark A Izatt

Chair – Heathrow Passenger Forum

Deputy Chair - CISHA

markizatt@cisha.org

cc Robert Toal
David Milford
Judith Corbyn
Mark Clifton
Martin Siner

ADDITIONAL BACKGROUND

(1) About the Heathrow Passenger Forum

The Heathrow Passenger Forum (HPF) monitors the end-to-end passenger experience. It considers any issue in connection with Heathrow Airport that would impact passengers and reports its conclusions and recommendations to CISHA and the airport. The HPF is comprised of independent members who represent a broad range of passengers along with a representative from each of the following organisations: ABTA, the Business Travel Association, and the Airline Operators Committee.

The group does this in four ways:

Monitoring the procedures and facilities available to passengers and making recommendations for their improvement to Heathrow Airport.

Holding quarterly meetings to receive briefings and opinions from Heathrow Airport stakeholders and external experts and using the outcomes and insights to make recommendations to CISHA and the airport.

Providing a passenger perspective on airport developments.

Contribute to government and CAA consultations that impact the Heathrow passenger.

(2) About the H8 Sub-Committee

In advance of H8 the Civil Aviation Authority (CAA) and Heathrow determined that passengers should be better represented during the H8 regulatory framework. The HPF along with Heathrow advanced a way of doing this using a combination of 2 existing members of the HPF together with 4 new independent members, selected specifically for this work. As well as being regular travellers they would also have different sectorial expertise and be comfortable and experienced of strategic scrutiny. One of those 4 would be non-UK based to ensure the transfer passenger was considered and we also included an extra care expert.

Membership

Mark A Izatt – Chair

Mark is a global brand and communications consultant with over 30 years' experience within the luxury spirits, technology, goods, and service sectors. He lived in NYC for 10 years. Mark is the Deputy Chair of CISHA and chairs the Heathrow Passenger Forum and has flown 2.2 million miles, to and from 140 airports throughout his career. He is a frequent connection passenger at Helsinki, Frankfurt, JFK and Doha airports.

Sarah Denyer – Deputy Chair

Sarah is a global marketer working both client (blue chip FMCG, pharma and finance) and agency sides. Sarah has a teenage daughter and has been an independent member of

the HPF for several years. She travels extensively for work and leisure – primarily, North America, Portugal and South Africa. She is a frequent connection passenger at Frankfurt Airport and occasional user of Gatwick.

Margaret Devlin

Returned to the UK in summer 2024 after 18 years in New Zealand (originally from Northern Ireland) where she built a portfolio of Chair and Non-Executive roles primarily in the infrastructure sector (water, energy, ports and airports), and also in the not-for-profit sector with roles such as Chair of Hospice Waikato. A strong background in sustainability and audit. Lives in Sussex. Her and her husband are active leisure travellers.

Ivan Dubovsky

Ivan has over 30 years business experience in senior general management, functional and advisory roles in blue-chip public, private and governmental organisations including top-tier management consultant at McKinsey & Company, banking and digital technology. He has worked in over 40 countries and has US, UK and Czech citizenship. He travels extensively especially to the East Coast USA and throughout Europe. He has three children from teenage to early adult.

Lorenza Porciello

Lorenza is a Partner at EY, leading the Danish risk practice within the infrastructure and energy sectors' based in Copenhagen. She has lived in Italy, Denmark and the Middle East, and worked in senior management roles for AP Møller-Mærsk, Maersk Oil and, Total E&P. As an attorney in her board and advisory roles, she has contributed to testing strategic ambitions with sustainable goals and measurements, promoting sustainable practices while maintaining and enhancing profitability and had a strong focus on employee engagement. She has two teenage daughters and is fluent in Danish, English, French and Italian. A regular user of Heathrow both as a destination and connection airport.

Geraldine Lundy MBE

Is an expert in passenger accessibility. Over 20 years at Virgin Atlantic, the final 8 as their Passenger Accessibility Manager. She is a director of the Accessible Travel Consultancy LTD and Deputy Chair of Heathrow Accessibility Advisory Group and an Independent Assessor for ACI World's Accessibility Enhancement Accreditation Program. She brings rich insights and has a strong understanding of Heathrow's accessibility offering in the context of other airports including London Gatwick.

Rebecca Cox

Secretariat

(3) About CISHA

The Council for the Independent Scrutiny of Heathrow Airport (CISHA) is an independent body that scrutinises and influences how Heathrow Airport engages with its local community and other stakeholders. Its purpose is to ensure that the concerns and interests of people affected by the airport's operations and any future development are heard and considered. CISHA also fulfils the formal role of an Airport Consultative Committee as set out in the Civil Aviation Act coordinating a network of local forums and stakeholders.