Response to the CAA consultation on regulatory models for Heathrow

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celeste@aef.org.uk

Aviation Environment Federation (AEF) is a UK-based national NGO that focuses on reducing aviation's environmental impact, particularly in terms of climate change, noise and air pollution. Internationally, we are a leading representative of the NGO grouping ICSA (the International Coalition for Sustainable Aviation) which has observer status to the UN's International Civil Aviation Organisation (ICAO). We have an active membership comprising local community and amenity groups living under flight paths and around the UK's airports. We welcome the opportunity to express our broader thoughts on the proposed changes to the regulatory model.

While we recognise that the CAA's primary function is to ensure consumer benefit in the airports sector, we believe that the scope of the regulatory models under consideration must include the mitigation costs of the very significant environmental and community impacts caused by the proposed expansion of Heathrow Airport. It is likely that any approved scheme will require the applicant to purchase properties, provide insulation and ventilation, commit to fixed monitoring and mitigation of emissions, and other environmental improvement works. Often, such programs can take years to implement because of the associated costs, delaying any community benefit. These impacts must be fully costed, and the costs must be borne by the scheme promoter. Therefore, we expect to see this question clearly reflected in the choice of regulatory model for landing and passenger charges in the future – with landing charges being the main vehicle through which any scheme promoter hopes to recoup their investment and guarantee a future income stream. How easily would any of the regulatory models - whether supervision of Heathrow's procurement processes or the more radical options to effectively run two separate airports in competition with each other - allow sufficient funds to be raised to cover these environmental costs and community compensation schemes?

In addition, from what we've read, we believe that insufficient attention has been given to the **future** costs associated with environmental restrictions which will constrain use of the new runway growth if certain limits are not met. For example, the government has pledged that the expansion must be delivered within our climate obligations under the Climate Change Act 2008, and the UK has strict air pollution limits on PM and NO2 which have only recently been met across London. Our legal obligations under the Climate Change Act are clear, and carbon dioxide emissions must be significantly reduced by the time the new runway is in operation (2035). In the very likely event of increased carbon dioxide emissions and NO2 from a quarter of a million extra planes per year using the runway, not to mention an expected 40,000 additional vehicle journeys per day, which of the models will guarantee that the costs of ensuring compliance with our future legal obligations are borne by the scheme developer? This is especially pertinent in the discussions which suggest that the design and build and operation functions could be separated, raising the possibility that one company could deliver the construction of the runway, while a separate company would operate it in the future. In this case, the costs associated with the future environmental impacts of the operation of the airport must be factored into any decision on splitting ownership or operation of the new runway.