



Mr. Stewart Carter,
Civil Aviation Authority
Westferry Circus
Canary Wharf
London EH14 4HD

cc: economicregulation@caa.co.uk

13th August, 2026

British Airway's ("BA") Response to CAP3286

Economic regulation of Heathrow Airport ("Heathrow"): Heathrow's Future Regulatory Framework

Dear Stewart,

British Airways welcomes the opportunity to respond to CAP3286 and writes in support of the submissions made by our parent company International Airlines Group, S. A. and Heathrow Reimagined.

As Heathrow's only network hub carrier, British Airways has a particularly strong interest in ensuring that Heathrow's future regulatory framework delivers better outcomes for passengers while supporting efficient and sustainable investment.

We agree that the CAA's work has established a compelling case for reform. Heathrow's exceptionally high costs, coupled with persistent shortcomings in service and delivery, underline the need to address the structural incentives within the current model rather than simply refine existing regulatory mechanisms.

For British Airways, strong capital governance is particularly important. Heathrow is approaching a period in which very substantial investment decisions may be taken. Those decisions will ultimately affect airline costs, passenger charges and the attractiveness of investing capacity at Heathrow. The proposed Capital Investment Committee therefore represents an important opportunity to introduce greater discipline, transparency and accountability. We encourage the CAA to establish the new arrangements as a priority and to apply them consistently across all categories of capital expenditure.

We also strongly support the development of a framework capable of facilitating genuine competition in the delivery and operation of airport infrastructure. That framework needs to be established early enough to influence investment and planning decisions, rather than after those decisions have effectively been made.

In addition, we urge CAA to consider how our proposals can be integrated into the upcoming H8 price control. We have consistently said that H8 is an inflection point – your decisions in H8 will set HAL's cost base and incentives, and consumer outcomes for decades.



British Airways remains committed to investing in Heathrow and to working constructively with the CAA. A more competitive, disciplined and affordable Heathrow will ultimately be a stronger Heathrow, and we encourage the CAA to maintain the pace and ambition of its reform programme.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Gavin Molloy".

Gavin Molloy
Director of Infrastructure, British Airways