

15th June 2026

Via email to: economicregulation@caa.co.uk

RESPONSE TO CAP 3251 – HEATHROW CAPACITY EXPANSION CONSULTATION ON A SHORTLIST OF REGULATORY REFORMS

Response Context

This further response on regulatory reforms is primarily on behalf of the Heathrow Passenger Forum (HPF) on the basis that overwhelmingly it is the passenger who is most impacted by current and future regulation. But in relation to the wider local community impact of a change to regulation, we recognise the importance of accountability, deliverability and transparency in any model which might add complexity (more than one operator for example) to the dynamic of important local community engagement and the necessary mitigations of the airport's activities

We recognise and support the original consultation submission by CISHA (20th January 2026) and in particular this extract;

“When assessing regulatory models, CAA’s framework could include greater emphasis on how different models incentivise the timely, robust, and enforceable delivery of mitigation, promote early design certainty to reduce prolonged uncertainty for affected residents, and reduce the externalisation of environmental and social costs onto communities. Explicit recognition of community impacts within the framework for the assessment of regulatory options would help ensure that Heathrow’s expansion is delivered in a way that is environmentally responsible, fair to affected communities and consistent with the CAA’s wider statutory duties.”

We welcome the CAA’s scrutiny and review of regulation at Heathrow. As needs and challenges change, and the airport and the aviation market grows, it is important that a balance of ‘risk and reward’ is maintained, but that the passenger remains at the heart of the equation and that the model supports consistent delivery, world class experience and innovation.

The comments made in our original submission (19th January 2026) all stand and in especially our focus on the needs of Passenger Assistance Service Users and Transfer Passengers as two key

passenger groups where additional ‘friction’ could have a negative impact on their travel experience.

Selection Criteria

We support the 6 proposed selection criteria with particular emphasis on;

- *“Avoid undue delay and disruption: the model is practicable to support the delivery of expansion and avoid any undue delay and disruption. By undue delay, we mean unnecessary delay that would inappropriately delay the delivery of benefits to consumers of expansion. This would have the effect that any benefits that would otherwise have accrued to consumers during the period of any delay would be lost.”*
- *“Promotes service quality: the model promotes an appropriate level of service quality, including improvements where appropriate.”*

Regulatory Model Options

The HPF still favours an evolutionary approach over any revolutionary change. The reasons for this are two-fold and already outlined in our original working paper response. Firstly, the need to avoid disruption and added risk to the expansion process that would see passengers impacted by and secondly, the risks to passenger service delivery through multiple operators. Competition is a desirable objective when it delivers enhanced, effective and efficient services, less so when it results in disruption and disparity. We believe that by expanding Heathrow this will provide passengers with greater choice (increased choice of airlines for example) and provide the competition they are looking for.

During the first phase of consultation, we indicated our support for models 1 through 4 which we argued were balanced territories to consider.

The HPF’s engagement with the CAA, Heathrow and the airlines throughout the H8 constructive engagement process has only reinforced our views that it is vital, as part of the new regulatory model that the CAA puts real consumers at the heart of the new framework rather than just the interests of commercial organisations (Heathrow and the airlines), addressing one of the key drawbacks of Heathrow’s current regulatory model in the governance process, which we feel is not currently set-up to act in the passengers' best interest.

On that basis we see most merit in;

- **Regulatory model 1a: Changes to CAPEX Governance Processes**
- **Regulatory model 3: Long-Term Regulatory Framework for Expansion**

In relation to the models where different terminal ownership and operations could become a reality, we do think that “inter-terminal competition” is limited because unless every airline was operating out of every terminal, there is no real choice. The consumer has their terminal choice “made for them” by their carrier. We are sceptical of the ‘consumer pull’ on the basis of, for example, ‘This terminal gets a higher satisfaction rating, therefore I’ll change my airline’. We also think that the risks of interoperability friction would only increase. Previously we made the point that where models like 7b exist it is in the context of an overarching quasi-governmental entity (e.g. JFK and the Port Authority of New York & New Jersey), multiple operators without that risk a complexity where the passenger suffers. As a result at this stage, we don’t believe that models 7b, 4b or 5b would be in the consumers’ interest.

Case for change – Service Quality

We welcome the CAA’s more rounded assessment of Heathrow’s current service quality performance. But believe that there are still a couple of further considerations that it is important for the CAA to make:

- a. As we stated in our initial response, we don’t believe the CAA should be using the Skytrax Airport Survey results as a valid measurement of service quality. As passengers who are regularly asked by numerous airports and airlines to vote for them, we see this activity more in terms of public relations and marketing rather than being a valid piece of consumer research. For example, Paris Charles de Gaulle was recently named as the 6th best airport in the world, despite it having numerous negative social media and web reviews in the last 12 months and it being frequently used by HPF members who have experienced that challenges of that airport !
- b. As discussed with the CAA, Heathrow and airlines as part of the H8 process, Heathrow’s passenger experience is closely linked to the volume of passengers using its facilities. Currently, most of the terminals are operating at or above their stated capacity. Heathrow’s ability to meet this demand relies on the expenditure envelopes that the CAA sets, so when assessing current service quality levels, we feel that it is important that the

CAA also needs to consider whether their past regulatory decisions were sufficiently future proofed to meet today's passenger demand and whether those envelopes were then efficiently spent to the benefit of the end consumer rather than it just financially benefiting the airport and airlines.

In Conclusion

We support the CAA's work on this journey. A more appropriate approach to regulation, which is better suited to future passenger needs and which is more transparent and efficient is a prize worth winning.

Yours faithfully

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ABOUT CISHA

CISHA ensures independent oversight of the way Heathrow Airport engages with stakeholders. The Council and its forums work with stakeholders to make progress on the issues that matter to them. We hold the airport to account and work to help ensure it is the best neighbour it can be. We fulfil the role of an Airport Consultative Committee (ACC) as set out in Section 35 of the Civil Aviation Act.

CISHA membership is made up of six forums: Local Community Forum (LCF), Noise & Airspace Community Forum (NACF), Heathrow Airport Transport Forum (HATF), Heathrow Sustainable Economic Growth Taskforce (HSEG Taskforce), Heathrow Air Quality Working Group (HAQWG), and Heathrow Passenger Forum (HPF). CISHA quarterly meetings also include representation from other stakeholders such as the local councils, airlines, the business community, and airport user groups.

ABOUT HPF

The Heathrow Passenger Forum 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 Forum does this in four ways: (1) Monitoring the procedures and facilities available to passengers and making recommendations for their improvement to Heathrow Airport. (2) 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. (3) Providing a passenger perspective on airport developments and (4) Contributing to government and CAA consultations that impact the Heathrow passenger.