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Dear Selina,

Heathrow Regulatory Reform: Support for the Heathrow Reimagined Submission to CAP3251

The Advantage Travel Partnership welcomes the opportunity to express its support for the Heathrow Reimagined response to the Civil Aviation Authority's Spring 2026 Consultation on Heathrow capacity expansion and regulatory models.

Advantage represents a broad network of leisure and business travel providers across the United Kingdom. Our members sit at the point where consumers and businesses purchase travel. As a result, we see directly how the cost, quality and competitiveness of aviation infrastructure ultimately affect passengers, corporate customers and the wider travel market.

For that reason, we have a strong interest in ensuring that Heathrow, as the UK's principal international gateway, is operated within a regulatory framework that delivers value for money, efficient investment and high-quality service.

The central conclusion of the Heathrow Reimagined submission – that the current regulatory framework requires fundamental reform – is one that we support.

From a travel industry perspective, the issue is straightforward.

When airport costs rise faster than they should, those costs ultimately flow through the travel ecosystem. They influence ticket prices, corporate travel budgets, package holiday pricing, route economics and the competitiveness of the UK as a destination for inbound visitors.

At the same time, consumers rightly expect that the prices they pay should be reflected in the quality of the experience they receive.

The evidence considered by the CAA suggests that Heathrow's charges are significantly above those of comparable international airports while service quality performance has not consistently

reflected that premium. That should concern everyone with an interest in the competitiveness of the UK travel sector.

We therefore welcome the CAA's recognition that there is a strong case for change.

In particular, Advantage wishes to highlight four areas that we believe are important to achieving better outcomes for consumers.

Affordability should be a central objective

The long-term success of Heathrow depends not only on its ability to expand capacity but on its ability to remain affordable.

The UK travel market is highly competitive and increasingly price-sensitive. Consumers have more information, more choice and higher expectations than ever before. They expect infrastructure investment to be efficient and to deliver tangible benefits.

A regulatory framework that encourages efficient investment and places affordability at the centre of decision-making will ultimately benefit passengers, businesses and the wider economy.

We therefore support calls for affordability to play a more prominent role in the assessment of future regulatory options.

Consumers benefit when incentives are aligned with outcomes

The purpose of economic regulation should not simply be to facilitate investment. It should be to ensure that investment delivers outcomes that consumers value.

Passengers care about reliability, resilience, customer experience, operational performance and value for money. The regulatory framework should create incentives that reward these outcomes and provide meaningful accountability where they are not delivered.

We therefore support proposals that strengthen governance, transparency and oversight of major capital programmes.

Competition has an important role to play

The travel sector is built upon competition.

Competition between airlines, travel businesses, destinations and service providers has delivered innovation, choice and value for consumers over many decades.

Where greater competition can be introduced into Heathrow's operating environment in a safe and practical manner, it should be given serious consideration. Competition can provide stronger incentives for efficiency, responsiveness and customer focus than regulation alone.

The objective should always be to ensure that passengers receive better service and better value from the infrastructure they help fund.

Expansion must be accompanied by reform

Advantage supports the objective of improving UK connectivity and increasing airport capacity where there is a clear economic case.

However, expansion alone is not sufficient.

The framework governing future investment must provide confidence that projects will be delivered efficiently, that costs will be controlled, and that passengers will receive genuine benefits in return.

A stronger regulatory model can help achieve these outcomes and improve confidence among consumers, airlines, investors and travel businesses alike.

Conclusion

The CAA's review presents an important opportunity to establish a more effective long-term framework for Heathrow.

Advantage Travel Partnership supports the broad direction of reform set out in the Heathrow Reimagined submission and believes the review should seek to deliver:

- stronger incentives for efficiency and value for money;
- greater transparency and accountability for major investment decisions;
- a clear focus on affordability for passengers and businesses;
- increased responsiveness to the needs of airport users; and
- greater use of competition where it can improve consumer outcomes.

Passengers ultimately fund Heathrow through the travel products they purchase. It is therefore essential that the regulatory framework places their interests at its heart.

We encourage the CAA, Department for Transport and HM Treasury to pursue reforms that support a more efficient, affordable and customer-focused Heathrow for the benefit of the travelling public and the wider UK economy.

Yours sincerely,



Julia Lo Bue-Said OBE
Chief Executive Officer
The Advantage Travel Partnership