

CAA Regulation Team
(economicregulation@caa.co.uk)

cc Hannah Newell, DfT (hannah.newell@dft.gov.uk)

Sent via email

26th May 2026

Dear CAA Economic Regulation Team,

I am writing to express the deep disappointment and serious concerns of the Heathrow Strategic Planning Group, and its constituent member Councils¹, on the Civil Aviation Authority's "initial proposals" position, in respect to Heathrow Airport Limited's H8 Business Plan 2027 – 2031. Our concerns relate largely to the implications of the consequent significant reductions in proposed investment, disproportionately affecting areas of community interest such as noise mitigation, surface access, infrastructure and environmental matters.

Recognising that the CAA has a number of responsibilities and functions to discharge (e.g. '*to secure the ability of the licensee to finance its activities including reasonable measures to mitigate the environmental effects of the airport*' and '*to take into account the costs of meeting Government targets on climate change, noise and air quality*'), it appears that undue and disproportionate weight has been given to the comparatively restricted interests of commercial airlines and tightly defined 'consumers' (e.g. passengers), as distinct from the wider interests of local residents, communities, the environment, climate considerations, local economy and sustainable growth across the sub-region. Indeed, the focus seems to be almost entirely on current passengers, not even future consumers. We can see nothing in the duties under which the CAA is operating that requires such a narrow approach.

In addition, a narrow interpretation of 'compliance' appears to have been applied, that overly focuses on regulation and statutory provisions, rather than compliance with national policy (which in some cases has set future targets or outcomes that are to be worked towards) and/or national/regional strategic objectives, which would support investment in, for example, noise mitigation, public transport, active travel and enhanced EV infrastructure.

Furthermore, the methodology used by Steer in support of the CAA's deliberations, that purports to establish objective thresholds, (based on a 'minimum need score' per project that determines whether or not it is considered in the indicative set of prioritised projects for H8) appears to demonstrate insufficient understanding of the issues and/or inadequate weighting and therefore scoring. As a consequence, the judgements made feel arbitrary and subjective. This applies especially harshly in the People and Planet element of H8.

Some examples reflecting the above, where significant reductions in planned expenditure are at odds with policy, community interests, the environment and the economy, include:

Transport/surface access

The London Orbital and M23 Route Strategy (May 2023) listed Heathrow as one of the primary economic anchors influencing travel demand on the M25, a key driver of future traffic growth and a cause of sustained congestion and resilience issues. Heathrow-related traffic is highlighted as a contributing factor to J14–J16 being one of the most congested sections of the entire London Orbital.

¹ Full Members of the HSPG (and signatories of an 'Accord') are: Elmbridge Borough Council, Royal Borough of Windsor and Maidenhead, London Borough of Ealing, London Borough of Hounslow, London Borough of Richmond Upon Thames, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council. Other organisations have 'Observer' status and participate in some activities, including: HMG, National Highways, LB Hillingdon, Buckinghamshire Council and the West London Alliance (of London Boroughs). The Group works closely with Heathrow and airport stakeholder groups such as Council for Independent Scrutiny of Heathrow Airport and Heathrow Area Transport Forum.

The report noted that airport-related demand will intensify congestion unless mitigated, leading to levels of delay being higher across the already congested route by 2031.

Key evidence considered by TfL London Assembly Transport Committee includes evidence that the Heathrow's public transport network is heavily dependent on the Elizabeth line, Piccadilly line, Heathrow Express, buses and coaches, all of which face significant capacity constraints.

Our understanding is that the H8 Business plan foresees growth of 6mppa, potentially up to 10mppa. No impact assessment of this growth on network capacity or resilience appears to have been undertaken, and therefore the impact that these proposals will have on the network remains unclear. In the light of this we would contend that the CAA should be applying the precautionary principle and retaining a reasonable funding envelope to support potential mitigation, rather than striking the entire budget.

The net effect of the current proposals will be no improvement in mode share for public transport or active travel, a worsening of congestion (directly affecting passengers and freight), no further action to support the transition to electric vehicles and adverse health and environmental effects for residents and the surrounding area.

Set against these current pressures and forecast future pressures within increased passenger numbers, and the likely impact these will have on airport and airline operations (for both passengers and staff) as well as their implications for people's health, the environment and economy, it seems inconceivable that virtually all investment in surface access, rail, active travel and multi-modal enhancements is so significantly reduced from HAL's proposed levels.

Noise and night flights

The proposed reduction, by c.80% (from £241m to £52m) in noise and vortex mitigation funding, gives little weight to the emerging evidence that noise mitigation has significant associated health, wellbeing benefits with productivity gains, for local residents.

In the airport's current Noise Action Plan, which was widely consulted on and subsequently approved by DEFRA last year, Heathrow committed to a comprehensive range of support schemes including a Home Relocation Assistance, Vortex Impact and Prevention Scheme and measures to mitigate impact on community facilities. The CAA's position on the value of the funding necessary to complete this work appears at odds with Heathrow and DEFRA's position and is dismissive of the engagement work undertaken to date with local authorities and community stakeholders.

It is insufficient to secure the necessary benefits simply to roll forward the existing provision for the noise insulation programme, which has historically been woefully inadequate to meet the scale of the challenge to local wellbeing. Not only is there no approval for increased spend, but provision for the existing programme actually reduces given that the CAA have removed the provision for noise reduction measures required under planning within the scheme for Easterly Alternation, but continue to assume that the relevant noise measures would still accompany implementation. On this basis, completion of the existing programme would extend from 15 years to over 100 years, which is clearly totally unacceptable.

Net Zero and Climate

The removal of all EV-related funding for the roll-out of EV infrastructure across the airport area, with the associated medium-term carbon and air quality impacts (impacts that disproportionately affect local communities), does not align with or take account of the Government's policy for transition to electric vehicles.

In addition, it is contrary to the current ANPS, which in the mitigation section states that:

“The applicant is expected to take measures to limit the carbon impact of the project, which may include, but are not limited to Zero or low-emission hybrid or electric vehicle use (ultra-low emission vehicles), charging and fuel facilities”.

Whilst we would not necessarily expect the business plan to cover a roll out of EV charging across the full estate, there must be a case for targeted support to ensure efficiency of operations of existing charging facilities and provision for groups for which the market may not supply (some staffing groups, the private hire fleet, operational vehicles and the like).

Waste and Nature

Spend for both zero waste and nature has been removed, despite in both instances there being acceptance of the case for action. Rather than committing funding against a recognised need, to programmes the detail of which would have to be developed, a narrow and somewhat ‘procedural’ focus is placed on an insufficient baseline or established measurable targets and in the case of waste, the absence of a reliable comparison with other possible approaches. HAL could simply have been asked to provide the necessary analysis.

Conclusion

All of the above points and requirements are currently live issues, with real implications for local residents, communities, the environment and local economy - as well as the airport and airlines themselves. They are germane for the H8 period from 2027 to 2031 and the increase in operations and in passenger numbers which are forecast to occur during this H8 period. They are not issues that arise solely as a result of the expansion of the airport.

We, HSPG, strongly urge the CAA to give proper consideration to the above and our concerns and review the determination of the funding associated with the H8 Business Plan. If this is not done and a more reasonable and equitable allocation of funding made to serve the needs of a much wider constituency, which includes the airport and airlines, then we foresee a substantial increase in the adverse impacts of the airport on the surrounding area given the planned significant increase in operations and passenger numbers in the H8 period

We would be pleased to discuss this with you further and expand on any of the above.

Kind regards,

Will Tuckley,

Chair, HSPG Chief Executives Steering Board
Chief Executive, Slough Borough Council