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Consumers and Markets Group **The CAA** CAA House 45–59 Kingsway GB - London, WC2B 6TE Sent by email: <u>economicregulation@caa.co.uk</u>

12th September 2016

Dear Sir

On behalf of the 24 Star Alliance member carriers operating at LHR, we write in response to the discussion document issued by the CAA in July 2016, entitled "The recovery of costs associated with obtaining planning permission for new runway capacity: initial proposals". We welcome the opportunity to review and provide feedback to the CAA on this important matter.

We have worked with the LACC and Heathrow AOC to formulate a detailed formal response to all the questions raised in the discussion document. We fully support and endorse the contents of that response, which has been sent to you today.

Rather than reiterate all the details contained in this response, we highlight the following two aspects which are of major importance to Star Alliance and its members. Note that we are assuming for the purposes of this response that Heathrow is awarded the new runway capacity.

- 1. Heathrow should not have the ability to recover planning costs from users until the assets are in use and providing benefit to consumers. It seems an incredible situation whereby airlines are being asked to pay now to support planning activities undertaken by HAL for an asset that delivers no benefit to them or their consumers for at least a decade.
- Airlines should not be accountable for the risks of not achieving a DCO or a halt to planning and development as a result of a change in government or its policy. These risks are totally beyond airlines' control and they should be borne in entirety by HAL, as the aggressive promoter of expansion.

We urge the CAA to take account of these points and those made in the LACC/AOC response as its firms up its policy decisions.

Yours sincerely

Sent by email

Simon Scoggins Consultant to Star Alliance Services GmbH Heathrow Programme Director