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## **HSPG Response to 2040 Zero Emissions Airport Target Consultation**

### Background

This response is made by the Heathrow Strategic Planning Group (HSPG), a constituted grouping of ‘willing’ local authorities and local enterprise partnerships <sup>(i)</sup> committed to jointly leading a collaborative multi-agency approach on the future planning of the functional economic area surrounding Heathrow Airport. The Group was formed in late 2015. It is independent of, but constructively engages with, Heathrow Airport Ltd (HAL).

The Group collaborates on interventions that could improve the area around the airport, and acts as a conduit between the members and Heathrow Airport Limited, Government, neighbouring area interests (including the West London Alliance of London Boroughs) and other key stakeholders.

Our work includes convening collaborative action around strategic spatial and infrastructure planning, economic development, local environment and surface travel. That role is potentially particularly important in the context of the zero emissions airport.

This response has been discussed and agreed at officer level across all HSPG members. Taking the main issues raised in the call for evidence HSPG would make the following points.

### Emissions Sources In Scope

HSPG supports an ambitious approach to zero emissions airports which should embrace Scope 3 activity, including surface access, not least because acting on scope 3 will generally require working in partnership with other organisations and in some cases collaborating on wider change in the area around the airport, energy infrastructure being a good example. That approach is likely to spread the benefits of delivering zero emission airports and position them as a mechanism for wider change including in the surrounding area.

### Implementation

HSPG supports a regulatory target for Scope 1 and 2 (not least to ensure consistency between airports) but suggests that Government should consider more flexibility around scope 3 emissions particularly if this is done in such a way to encourage or require collaboration with other organisations in the area. So, in the case of Scope 3 voluntary agreements and the development of road maps in collaboration with and endorsed by multiple stakeholders should be stipulated.

This could be reinforced by powers for the airports to convene organisations which have operational control over relevant processes or activities to ensure that all of them participate, or alternatively a duty on those stakeholders to be involved in the process. In practice pre-existing arrangements such as airports consultative fora and via engaging organisations like HSPG which already bring together a range of relevant stakeholders in the wider area could likely provide the necessary structures.

Good examples of the kind of collaboration in implementation with the wider area could include energy infrastructure, HGV movements, EV charging systems and sustainable transport (bus, cycling, rail access planning).

In terms of initiatives to encourage implementation, airports should be given credit, potentially through the system of economic regulation or through changes to the taxation regime for capital investment, for supporting the development of the technologies that will be needed but are not yet either available or in place e.g on de-icing equipment.

We should also note that the target date of 2040, whilst no doubt challenging, does fall short of the need identified by IPCC and others for urgent progress and the aspirations of many of stakeholders who have declared climate emergencies in recent years. For example, the GLA area is working towards a net zero target for the city of 2030. Consideration should therefore be given to the definition of pathways that deliver the aspirations earlier than 2040 – potentially through the encouragement of trailblazer sites and interim targets.

### Barriers to Implementation

HSPG strongly supports the need for a whole of government approach – central government, CAA as economic regulator, airports, airlines and others including sub-national transport bodies. For zero emission airports to be successfully implemented there needs to be strong, clear and consistent (for all airports) policy mandates and requirements; support for innovation and pace in the necessary technological developments; proper recognition of the additional costs being borne through the system of economic regulation of the airports with the CAA having a specific and far more explicit obligation to support decarbonisation; and the necessary investment in the enabling infrastructure, particularly the electricity transmission grid.

### Measuring and Reporting Emissions

Whilst the aim is for zero emissions there may be some residual emissions, particularly in relation to Scope 3, for which high quality offsets are needed. HSPG would encourage such offsetting being undertaken as far as possible in the locality of the airport, and this could be given further emphasis through the zero emissions airport initiative. HSPG has been working on the development of a detailed road map for local offsets and whilst this is obviously focused specifically on Heathrow, this map could offer a good starting point for wider application of the principle of locality based offsetting.

We trust these points and suggestions are helpful and look forward to working collaboratively with the DfT on this agenda moving forward.

Yours Sincerely,



Mark Frost, Associate Director Heathrow Strategic Planning Group  
On Behalf of HSPG members

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<sup>1</sup> Full Members of the HSPG (and signatories of an 'Accord') are: Elmbridge Borough Council, Royal Borough of Windsor and Maidenhead, Enterprise M3 Local Enterprise Partnership, London Borough of Ealing, London Borough of Hounslow, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council, Thames Valley Berkshire Local Enterprise Partnership

Other organisations have 'Observer' status and participate in some activities, including: Government, National Highways, LB Hillingdon, LB Richmond and 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.