

Sent via email to robert.courts_MP@dft.gov.uk

17th December 2021

Dear Robert,

HSPG response to CAP2265A 'Initial Proposals' Consultation

Background

Heathrow Strategic Planning Group (HSPG) is a constituted grouping of 'willing' local authorities and local enterprise partnerships committed to jointly leading a collaborative multi-agency approach on the future planning of the functional economic area surrounding Heathrow Airport. 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.

Appended to this letter is our response to the CAA's latest consultation on their 'Initial Proposals' for the next Heathrow Business Plan for 2022-2026. HSPG have responded to the previous consultation on this subject (CAP2098) highlighting a greater need to consider the importance of decarbonisation in the assessment framework being employed by the CAA when determining the adequacy and acceptability of the airport's Business Plan.

Despite these previous representations, and the fact that this consultation launched in the run up to the UK hosting the COP26 summit, there is still little discernible evidence that the national challenge of decarbonisation is being properly considered by the CAA. As evidence, there is, quite incredibly, no mention of carbon reduction, net-zero or even sustainability more generally in the CAA's summary document accompanying this consultation. We can therefore find little evidence to suggest that our previous submissions have been properly considered as required.

To this government's credit, there is now clear direction on decarbonisation from the top of government, most recently articulated in the Net Zero Strategy, and also the draft Jet Zero strategy for removing carbon from aviation sector. It is our understanding that there is an emerging plan by the airport to rise to this challenge, however the current process of economic regulation that applies to Heathrow appears to be standing in the way of achieving this objective by limiting available resources for delivery. The lack of focus on reducing carbon by the regulator is therefore wildly out of step with the wider policy direction.

We urge you to issue urgent advice to the CAA to ensure they properly take into account higher-level policies and strategies when discharging their duties as economic regulator, and start playing a proactive role in facilitating the investment and coordination necessary to decarbonise the airport at the pace compliance with Government targets requires.

I look forward to hearing from you.

Yours Sincerely,



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