

Department for Transport
Jet Zero Strategy Consultation
Via Email only to NZaviationconsultation@dft.gov.uk

8 September 2021

Heathrow Area Transport Forum (HATF) Response to Department for Transport's Jet Zero Consultation

HATF is a partnership between organisations in the private and public sectors with a shared goal of improving accessibility and increasing public transport use to and from the airport and the surrounding area. It operates in line with guidance set out by the DfT in their Aviation Policy Framework 2013. We have reviewed the draft Jet Zero strategy in line with that remit and make the following points.

1. Jet Zero does not consider adequately aviation related emissions relating to surface access

There is no specific reference of the need to decarbonise surface access to airports in this document, or in the wider Transport Decarbonisation Plan. This is a missed opportunity. Total CO² emissions from surface access are not significantly smaller than for ground-based aviation movements which get far more attention - despite surface access having a much more readily deployable range of solutions to reduce emissions (particularly in the shorter term). Airports could – and should - become exemplars of a decarbonised surface transport system. The focus of the final Jet Zero vision should be widened to include a focus on this.

2. The CAA's role as economic of regulator of Heathrow must be reviewed, with a specific remit to work towards decarbonising airport operations provided

In previous consultation responses to the Civil Aviation Authority (CAA) on the economic regulation of Heathrow, HATF has pointed out the need to bring environmental considerations fully into the decision-making framework under which the Authority discharges its duties as the airport's regulator. In the light of the challenging pathway to aviation decarbonisation set out so clearly in Jet Zero, it can no longer be tenable for environmental protection to be considered a 'secondary duty' within that framework. There is an urgent need for the CAA to work in partnership with the airport operator to facilitate decarbonisation as quickly as practicable. The final Jet Zero strategy should therefore commit to reviewing the guidance provided to the CAA on how it should consider decarbonisation when discharging its functions as economic regulator, and to elevate the primacy of environmental protection within that framework.

3. Demand management should be considered as a short-term tool of reducing emissions, whilst the most polluting aircraft remain in operation

We note that the strategy as currently drafted does not recommend any explicit attempts to actively manage aviation demand as a way of reducing emissions in the shorter term. Whilst the matter of aircraft movements sits outside of HATF's direct remit, it is noted that demand management of other transport modes does form an accepted tool within the wider Transport Decarbonisation Plan. It is not immediately clear why aviation should be treated differently to the wider transport network in this respect. Given the pressing need to decarbonise all sectors as quickly as possible, and the long timelines for technology to deliver significant carbon savings from aviation (which means many polluting aircraft are unlikely to be replaced imminently), the potential role of demand management in curbing emissions in the short term whilst the most polluting aircraft remain in the skies should be under active consideration. We would recommend that the position taken on demand management should be reviewed if demand returns to pre-pandemic levels at pace, within the next couple of years.

4. Any review of infrastructure requirements at airports to support decarbonisation must also consider how such investment can support decarbonisation across the wider sub-regions within which airports are situated.

We note the strategy's reference to a review by the CAA into infrastructure needs at airports to deliver low carbon flying. This is a welcome piece of work which will aid our understanding in more detail of pathways to zero carbon aviation. It will however be a missed opportunity if this review only considers the requirements of decarbonising aircraft movements and airport campuses, and not the wider opportunities that could exist to reduce emissions across the sub-regions in which these facilities sit. For example, an assessment of grid resilience around Heathrow that only considers the potential future requirement of electrification of some flight movements or terminal heating solutions would only provide (at best) a very partial assessment of future electricity demand in the locality given the wider commitment to electrification of transport from all surrounding local authorities and many large businesses. On the flip side, those wider local markets (perhaps especially around Heathrow as the UK hub airport) could also offer significant economies of scale for deployment of new technology. This wider demand would have a very positive impact on the viability of investment in infrastructure to facilitate low carbon futures – assuming that such infrastructure can be designed in such a way to be open to wider utilisation beyond just aviation. Wider utilisation of such infrastructure would also increase the decarbonisation 'bang for buck' of such investments, as well as help generate green growth in these sub-regions, many of which have been hit particularly hard over last 18 months as a result of aviation downturn.

5. Market based mechanisms should include surface access emissions

We accept that market-based mechanisms (offsetting) have a role to play in reducing emissions, particularly if they are implemented in earnest, with aggressive CO² reduction ambitions hard wired in and monitored robustly. It would be helpful to explore whether the proposed UK Emission Trading Scheme (UKETS) be increased to cover aviation related surface access interventions as well as flights. There are many proven and cost-effective interventions for reducing emissions from surface access which makes this a promising area into which investment should be guided.

6. Information to customers on emissions from flight should include the impact of surface access choices.

We note the work to be undertaken by the CAA to consult on environmental information provisions later in 2021, and the intent to explore whether mandating the provision of such information to passengers at the time of booking could drive a move towards lower emission flights. This work is to be welcomed, but we would urge that such provisions include information about the impact of surface access choices to and from airports as well.

We hope these are constructive comments on what is generally a very exciting vision for a low carbon future for aviation.

Yours faithfully,



Valerie Shawcross CBE - Independent Chair, Heathrow Area Transport Forum