Transport for London



Rob Toal, Head of Heathrow Regulation, Civil Aviation Authority

Via email only to: economicregulation@caa.co.uk

Transport for London City Planning

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16 December 2021

Dear Mr Toal,

Response to CAA consultation on the economic regulation of Heathrow Airport Limited: H7, Initial Proposals (CAP2265A)

I am writing in response to this latest consultation on the regulation of Heathrow Airport Limited (HAL), and in particular to emphasise the importance of ensuring HAL is able to take targeted, concrete steps to address its environmental impacts.

As the consultation summary notes in paragraph 90, the CAA is "required to have regard to...the need to secure that HAL can take reasonable measures to reduce, control or mitigate the adverse environmental effects of Heathrow airport." In the context of Government and London commitments to achieve net zero carbon emissions and the key role of aviation within that, as highlighted by the recent Jet Zero consultation, it is essential that HAL takes its share of responsibility in securing this, even in a two-runway scenario.

Moreover, recognising the challenges in full decarbonisation of flights in the short term, securing sustainable surface access mode shift, away from private vehicles to public transport and active modes, is a key element of securing net zero carbon – as well as improving air quality.

As such, the CAA must ensure that the regulatory settlement gives adequate prioritisation to sustainable surface access mode shift and so enables HAL to invest in strategic and tactical schemes and initiatives to shift passenger, staff and freight trips. TfL is ready to work with HAL and other interested stakeholders to support these efforts.



To be clear, it would not be acceptable for efforts to address the environmental impacts of Heathrow to be paused in the mistaken belief that they are 'nice-to-have' rather than essential. The climate crisis – and the urgency of addressing UK carbon emissions, including the aviation sector – requires action now and it cannot be delayed.

Yours sincerely

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