# Aviation Environment Federation (AEF) Written Evidence to the Environmental Audit Committee inquiry into Airport Expansion and Climate and Nature Targets

## Overview

There is no definitive “iron clad guarantee” that increased emissions from any individual application for expansion will not compromise our ability to meet carbon budgets and targets. While there have been national modelled scenarios of how emissions from aviation could reduce in the future, there is a **“policy lacuna**” when it comes to how to interpret these forecasts in planning decisions for new airport capacity.

Experience from the recent DCO hearings at Gatwick, Luton and Manston points to the difficulties faced by planning inspectors in knowing how to assess the significance of emissions from a project in a national policy and carbon budget context. And where the Examining Authorities in the cases of Luton and Manston concluded that climate concerns should weigh against a project, leading them to recommend refusal when other issues are also taken into account, Secretaries of State have given less weight to this advice and have granted permission.

Explanation of the policy lacuna:

- Established policy has been that mitigation of aviation greenhouse gas emissions and climate impacts is best addressed at the national level. Under the previous Government, this approach was set out in the Jet Zero Strategy (2022). While the Government has introduced some policy to deliver the forecast mitigation, such as the SAF mandate, policy gaps remain. This includes the absence of a SAF mandate for the period from 2040 to 2050, and any carbon pricing mechanism for international aviation not covered by the UK ETS after 2035 when ICAO’s CORSIA scheme is set to conclude. This means that while carbon pricing is relied upon in the Jet Zero Strategy to deliver the biggest wedge of emissions reductions, the reality is that the most polluting long-haul, non-EU flights face almost no penalty on their carbon emissions.
- Formal inclusion of International Aviation and Shipping (IAS) emissions under the UK’s Carbon Budgets could provide a means to keep aviation emissions in check, but despite a commitment to including IAS in the Sixth Carbon Budget, the Government has yet to lay the necessary secondary legislation before parliament (it was promised by the Johnson Government in 2021). Failure to legislate will have far reaching consequences as the legislated target for the Sixth Carbon Budget was adopted on the basis that IAS would be included (i.e. the total was adjusted upwards): if the Government changes its mind about IAS, the budget for the rest of the economy will be left overinflated, undermining economy-wide efforts to reach net zero by 2050.
- The only significant climate test in the DCO process to determine whether an expansion should go ahead is the ambiguous “material impact” test in the clearly out of date Airports National Policy Statement (designated in 2018 before the net zero target became law in 2019), namely that any increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets. In making their case for expansion, and despite environmental assessments showing that emissions will increase against a base case with no expansion, airports have

> argued that the illustrative scenarios in the Jet Zero Strategy provide evidence that the test can be met since they factor in national-level growth. Each airport applying for permission is, in effect, claiming that their plans would use a share of this growth, but there is no formal assessment of **cumulative** demand and emissions from all proposed developments. This prevents scrutiny, and makes it difficult to determine decisively whether one development could, in itself, make it impossible to meet the test. In the case of Gatwick, it required an FOI request to show that Jet Zero hadn't modelled the emissions associated with a second runway because the availability of capacity elsewhere meant that the model predicted very little growth in traffic. Based on these experiences, we believe this test has proven inadequate.

AEF has serious reservations about this reliance on Jet Zero. It is a strategy, and we don't have credible policy in several key areas that are relied upon to drive emissions reductions. Other than for so-called sustainable aviation fuels (SAF), there is no policy to realise the potential for zero-emissions flight, deliver greenhouse gas removals and to address non-CO2 impacts. In terms of carbon pricing, the two policy levers - CORSIA and the UK ETS have carbon prices below the assumed carbon values used by the government in its modelling. All pillars of the Jet Zero Strategy should also be considered against a backdrop of high abatement costs, investor uncertainty, and question marks about the availability of sustainable feedstocks, surplus renewable energy and green hydrogen at the scales required. This has been independently assessed to pose a significant risk to the chances of successful delivery.

**We believe there should be a revised ANPS and equivalent policy for airports developments not considered to be nationally significant, a clearer process for how to assess the climate impacts of airport expansion. We argue for an explicit requirement to consider the cumulative impact of all proposed expansions if they are used to their full capacity (in other words, a cumulative emissions assessment).**

## Introduction to AEF

The Aviation Environment Federation campaigns on aviation, for people and the environment. Our focus is on aviation policy (relating to climate change, noise and air pollution), and we have participated in numerous Government engagement and working groups over the years. Internationally, we are a lead member of the NGO grouping ICSA (the International Coalition for Sustainable Aviation) which has observer status to the UN's International Civil Aviation Organisation.

We very much welcome this inquiry by the EAC, which coincides with several important decisions regarding airport expansions in the UK, notably the recent announcement to support Luton Airport expansion, a pending decision on an application for a Development Consent Order to operate a second runway at Gatwick, and plans for a third runway at Heathrow. These three airport projects alone could cater for a further 80 million passengers per annum. Since the UK adopted a net zero target in 2050, airport expansions have also been approved at Stansted, London City, Bristol, Southampton and Manston.

## Expanding airport capacity within the Government's climate and environmental obligations

**Question 1. Which statutory targets and which non-statutory obligations (both national and international) relating to climate and the environment apply to Government policy on (a) the development of UK airport capacity in general and (b) the development of Heathrow and other airports in the South East of England in particular;**

**Statutory targets**

**Carbon and GHGs** - the Climate Change Act 2008 sets a binding target of Net Zero economy-wide by 2050, and a series of five-year budgets to meet the target. Currently, the UK's share of emissions from International Aviation and Shipping (IAS) is not included directly so, for carbon budgets 1 through to 5, the total emissions allowed to be emitted in each budget has been adjusted to leave "headroom" for IAS. In 2021, the Johnson Government committed to including IAS in carbon budgets in the Sixth Carbon Budget (CB6) via the laying of secondary legislation, but this has not yet been done. However, CB6 has been legislated on the basis that IAS will be included under the Act before it starts in 2033 and the total has been adjusted upwards accordingly. If the Government changes its mind about including IAS, CB6 will be left with an over inflated budget creating less pressure on other sectors of the economy to reduce their emissions at the pace required to meet net zero by 2050.

The Act also requires the government to consider the advice of the CCC, but it is not legally obliged to follow it. The CCC's CB6 advice recommended "no net airport expansion" on the basis that the 25% growth in passengers deemed consistent with meeting net zero could be met through existing capacity. In its recent advice on the Seventh Carbon Budget (CB7), the CCC recommends that the growth in demand for aviation is reduced through strong carbon pricing with the aviation industry passing on the costs of decarbonisation to passengers through increased ticket prices.

The Paris Agreement commits states to working together to hold temperatures below 2C and is legally binding. As a temperature goal it has relevance to all sectors and impacts. Arguably this has implications for the need for action to reduce aviation's non-CO2 emissions (such as contrails) which historically have trebled the climate impact of flying compared to the sector's CO2 emissions alone. Nationally Determined Contributions (NDCs) are not legally binding, and the UK has chosen not to include IAS in its NDCs to date. In 2020, the Court of Appeal ruled that the Government had a duty to consider the 1.5C ambition under the Paris Agreement (the Government admitted to using the 2C limit not the 1.5C limit when calculating the impact on emissions from expanding Heathrow Airport).

The UK Emissions Trading System (UK ETS) attaches a carbon price to emissions from planes flying within the UK and departing to destinations in the EEA and Switzerland. Airlines are obliged to surrender allowances for the emissions on these markets. ETS allowances are "capped" to reduce emissions over time, however airlines are currently given a number of free allowances (although these will be phased out in the coming years), and flights to anywhere outside the EEA are not covered (i.e. all long-haul)

**Noise** Three London airports, Heathrow, Gatwick and Stansted are "designated" for noise purposes. These establish maximum noise limits for departing aircraft and regulate the number of flights permitted at night (via a movement cap and a noise quota). However, there are no legal limits on overall exposure to noise, except for some individual airports that have planning conditions limiting either movement numbers or noise exposure.

**Air pollution** - Air Quality Standards Regulations 2010, include an annual mean concentration of NO2 not exceeding 40 µg/m3 and no more than 18 hourly exceedances

above 200 µg/m3, and by 2040, an annual average of 10 µg/m3 for PM2.5 is not to be exceeded. There are no legal limits targeting ultrafine particles although they fall within the PM2.5 requirements.

**Non-statutory targets**

**Carbon and GHGs.** The UN International Civil Aviation Organisation resolution on climate change sets a long-term aspirational goal (LTAG) of net zero by 2050 for international aviation and, in the short-term, carbon neutral growth from 2020. Both targets are aspirational and not legally-binding. Aside from encouraging SAF through a collective aspiration to use SAF to reduce global emissions from international aviation by 5% by 2030, and setting CO2 standards for the manufacture of aircraft, the UN's offsetting scheme "CORSIA" is the only attempt to limit emissions although it only requires offsetting for emissions from international aviation above 85% of the 2019 baseline level. These offset units can be sourced from eligible projects from the international voluntary carbon markets (although the CCC has advised that international carbon credits should not be used in UK carbon budgets). States can decide not to participate in CORSIA but if a state does participate then it is mandatory for its airlines to comply. The scheme is currently set to end in 2035. The government is consulting on how to incorporate CORSIA into UK law on international routes where there is an overlap with ETS (see above).

**Jet Zero.** The previous Government adopted the Jet Zero Strategy. To our knowledge, this Government has yet to formally endorse the strategy, although it is currently defending the strategy in a judicial review challenge in court. AEF commissioned independent analysis on the likely effectiveness of the Jet Zero Strategy from consultants Element Energy, now part of the ERM group. EE's report found that the Government's 'Jet Zero' plans overestimate the likely improvements in operations, technology and alternative fuels and rely on uncertain solutions. Significant risks include relying on improved system efficiencies, assuming high sustainable aviation fuel (SAF) uptake levels, a misleading portrayal of SAF emissions abatements and failing to account for the non-CO2 impacts of aviation. While new technologies and fuels will be necessary, they are unlikely to be developed at the speed and scale needed to deliver net zero aviation without reductions in demand being delivered in parallel. The report concludes that a halt to airport capacity growth and demand reduction measures pose a far less risky approach to hitting net zero aviation by 2050 and the 78% economy-wide emissions cut to which the Government has committed by 2035. EE criticises the trajectory of the Government's preferred scenario for delivering 'Jet Zero', and argues for an alternative approach that requires the sector to make deeper cuts to its emissions in the near-term to help reduce risk and to minimise the total amount of CO2 emitted between now and 2050. The following graph summarises the risks associated with the strategy:

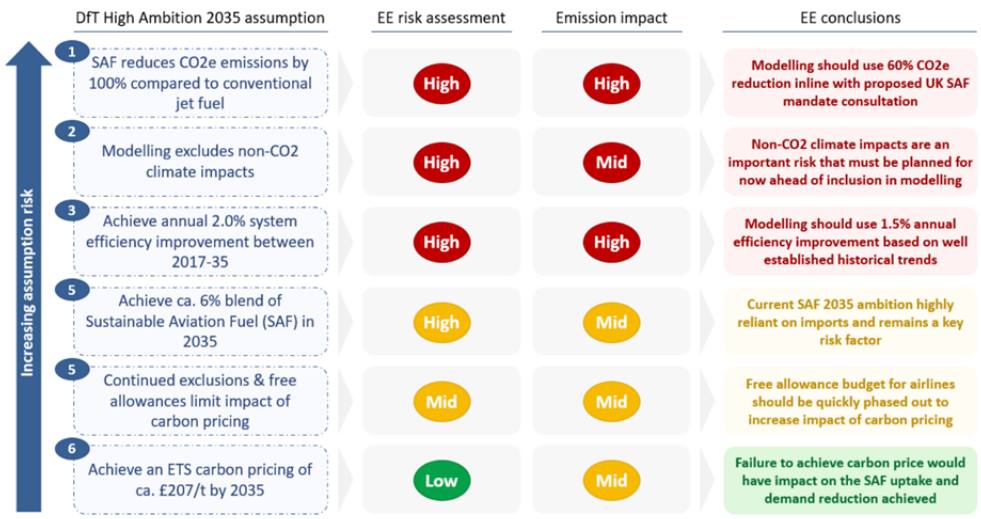


**Figure 2: overall risk assessment of DfT High Ambition scenarios in 2035**

elementenergy
an ERM Group company

**Air pollution** WHO guidelines are considerably stricter than UK legal limits (NO2 10ug, PM2.5 5ug), and there are best practice statements with regard to UFPs.

**Noise** WHO guidelines set thresholds for maximum daytime and night-time noise exposure that are already exceeded at most UK airports.

**The ANPS** guides planning decisions for nationally significant airport infrastructure projects. Although it is primarily supportive of the development of *only* the north-western runway at Heathrow, recent planning hearings at Luton and Gatwick have shown that it is read as a key policy consideration. However, the language on emissions in the ANPS is very weak: section 5.2 merely states that a project should only be refused if it has a "material impact" on the UK's ability to meet carbon budgets. This is not quantified and there is no requirement to consider cumulative emissions from all new airport expansions in the UK. The Appraisal of Sustainability which accompanies it does not quantify the carbon emissions of the planes in flight (only from the construction and operation of the terminals and runways). The ANPS has also not been updated to reflect the change in the UK's legally binding climate target (to net zero from the previous 80% reduction target) which happened in 2019. Recent planning hearings have shown that even when Planning Inspectors are keen to scrutinise the increased emissions from a project, airports argue that emissions are dealt with "at the national level" and are addressed by the Jet Zero Strategy. This makes it difficult to set airport specific climate conditions that could hold airports to account.

**Making Best Use** of existing runways is a policy guiding planning for airport plans that are not part of the NSIP process. The Bristol Airport expansion inquiry showed that planning inspectors were guided to not consider emissions at the local level, but again to rely on national aviation emissions reduction policies. It is inadequate to fail to consider all the emissions from all these smaller projects in the context of expansion plans at numerous other airports - in other words there should be a cumulative emissions assessment where all expansion plans can be considered in context.

**Question 2. What effect the enactment of proposed legislation to include international aviation emissions within the Sixth Carbon Budget and subsequent budgets will have on the UK's ability to meet its climate commitments in respect of aviation**

Ensuring that IAS is included in the UK's carbon budgets means that emissions are formally included in the economy-wide target to meet net zero. In practice this doesn't constrain IAS emissions, but if aviation emissions reductions fail to meet their assumed trajectory, other sectors will have to work hard to make additional reductions to compensate. If other sectors have no capacity to reduce further then an increase in aviation emissions - for example, as a result of airport expansion, could jeopardise our ability to meet targets. As the CB4 and CB5 targets have been met, there is as yet no legal precedent for what would happen in the event of the UK missing its overall carbon budget. Because the carbon budget is economy-wide, and the CCC only provides indicative pathways of how these reductions may be delivered, there is a possibility that future governments could consider that aviation is still a "special case" and could continue to give the industry a generous licence to pollute. We would strongly recommend against this outcome.

For the Fourth and Fifth Carbon Budgets, IAS is not included but headroom has been left in the budget set for the other sectors (i.e. a deduction is made from the original calculation to account for IAS). However, there are no consequences for international aviation (and shipping) sectors, or carbon budgets overall, if this headroom is exceeded. We therefore support inclusion of IAS in budgets and urge the Committee to push for secondary legislation to make this possible as soon as possible.

**Question 3. What emissions reductions from domestic and international aviation are currently likely to be required to meet the Sixth Carbon Budget; and what effect the Government's policy on airport expansion is likely to have on the ability to deliver these reductions.**

CB6 starts in less than 8 years. The CCC's balanced pathway trajectory for CB6 envisaged aviation emissions reducing to roughly 33Mt by 2030, 30Mt by 2037 (end of CB6) and 23Mt by 2050, leaving significant "residual" emissions which would need to be balanced out with greenhouse gas removals. The Jet Zero 'high ambition' trajectory, as revised by Jet Zero One Year On, assumes a similar pathway with aviation emissions at 35.4MtCO2 in 2030 and approximately 30MtCO2 in 2038.

Yet, even before major expansion projects have been approved, there are worrying signs that aviation decarbonisation is not making progress. Emissions from UK international aviation in 2024 were 0.1% above 2019 levels, standing at an estimated 37.4Mt[1]. Up to 2019, there had been no measurable consistent reduction in emissions since 2006 (although there was a slight dip from 2008-10 following the financial crisis).

At the same time, some of the expected emissions savings from the use of SAF are slow to materialise, with the Climate Change Committee estimating that only 17% of aviation fuel will be SAF in 2040 (the SAF mandate requires this to be 22%). Our wider concerns about the ability to deliver the Jet Zero Strategy have already been set out above.

**Airport expansion will compound the problem**

In terms of impact from expansions: Jet Zero did carry out modelling which took into account proposed airport expansions. These were labelled as illustrative scenarios. The fact that all known airport plans were factored in as an input, and the fact that the output suggested that

[1] Provisional figures from Desnz indicated the figure for international aviation emissions in 2024.

net zero could be met (if you accept that residual emissions of 18.7MtCO2 in 2050 to be met with greenhouse gas removals is consistent with meeting net zero), allows industry to claim that expansion does not threaten targets. However, we do not accept that the answer is so clear cut.

AEF made an information request to the Department for Transport for the detail of any Jet Zero emission forecasts for Gatwick expansion. The results showed a 2050 figure for Gatwick that was significantly lower than that forecast by the airport. The reason is that while the model had included the increased capacity from planned projects the model showed that not all the capacity would be utilised. In Gatwick's case, the modelling suggested that movements in 2050 would be at the same levels as they were in 2019 despite the second runway. This was due to the availability of airport capacity elsewhere and airline preferences. So while it is fair to say that the proposed capacities were included in the modelling, it appears that the full utilisation of all of these capacities has not been modelled, and therefore the consequences for the Jet Zero trajectory and UK climate commitments cannot be fully understood.

Airport expansions approved since the Sixth Carbon Budget was set, combined with decisions yet to be taken on Gatwick and Stansted, would allow for an additional 92 million passengers per annum and over 400,000 additional annual flights. Essentially carbon budgets will be at risk if the government does not achieve the emissions reductions relied upon in Jet Zero, while growth will compound the problem. The Airports Commission predicted that Heathrow, if given permission to construct a third runway, would fill up its slots very quickly. Given that a third runway, even if approval is fast-tracked, is unlikely to open before 2035, this rapid growth will take place in the middle of the Sixth Carbon Budget.

All of this indicates that independent, robust new modelling scenarios should be carried out to examine the carbon impact of any expansions on a case by case basis, with a view to establishing the cumulative impact of all expected expansion plans. It also suggests that without clearer language and meaningful, quantifiable "tests" in the ANPS, the question of whether an individual airport expansion would "materially impact" the UK's ability to meet its carbon budget is moot and somewhat subjective.

## Scope for development within current climate and environmental obligations

**What projections have been made for the demand for passenger and freight capacity at UK airports by 2050; and to what extent current proposals for expansion of airport capacity in England meet these projections***;*

The last official forecasts of passenger demand, aside from jet Zero modelling, were released in 2017, having previously been published at 3-4 yearly intervals. Uncertainty about the rebound from the Covid pandemic and general market uncertainty have been cited as reasons why more up to date forecasts have not been published.

We have already discussed the lack of clarity surrounding how the modelling in Jet Zero treats airport expansions.

It is worth highlighting that the model is extremely sensitive to changes in the global economic outlook. Jet Zero modelling originally predicted that net zero goals could be met with a 70% increase in passengers over 2018 levels but this was revised to 52% in Jet Zero One Year On due to changes in the outlook for GDP in some regions.

**What projections have been made for the likely climate and environment impacts of domestic and international aviation from UK airports by 2050 in relation to the latest Government estimates of aviation and airport growth;**

Jet Zero and Jet Zero One Year On both provide modelled scenarios for the emissions associated with growth in the UK aviation sector, and we have provided our views on these documents above. The CCC's CB7 analysis is also significant as it takes a less optimistic view on the likely uptake of SAF and zero emission technologies. Prior to this, the Airports Commission work provided assessments of Heathrow and Gatwick expansion with reward to greenhouse gas emissions, noise, air pollution and other environmental factors.

**What projections have been made concerning the contribution of (a) technological innovations in aviation (b) aviation emissions trading schemes and (c) changes in airport operations to reducing overall emissions from UK domestic and international aviation; and to what extent aviation emissions are expected to be offset by carbon removals elsewhere to ensure that the UK meets net zero by 2050.**

As above, Jet Zero and Jet Zero One Year On provide an assessment of the likely role of SAF and zero emission aircraft, and we have commented on the lack of policy in some areas to drive policy, and the challenges faced in securing investment given the high abatement costs.

The carbon price is critical to the Jet Zero modelling. In the Jet Zero 'High Ambition' scenario carbon pricing accounts for 27% of the emissions reduction in 2050 through higher air fares and the consequential impact this has on demand for air travel. In Jet Zero the assumed carbon price is taken as a proxy for decarbonisation costs. However, the UK ETS allowance price was significantly below its EU counterpart in the summer of 2023 following a Government decision to allow entities to retain unused allowances issued during the pandemic, and the price has continued to fall. In December 2023, allowances are trading at £32.66, significantly below the low price scenario used in the modelling. According to the Jet Zero modelling, UK ETS allowance prices in 2023 were assumed to be £71tCO2 in thecentral scenario, £95tCO2 in the high scenario and £53tCO2 in the low scenario.

Prices are likely to remain lower than forecast until at least 2027. It is evident, therefore, that if the actual ETS price is lower or higher than the assumed ETS price, there will be a consequence for both emissions and demand, suggesting that emissions (and demand) are likely to be higher than predicted. Similarly, it is assumed that a global carbon price, aligned with ETS values, will be effective after 2035. Given that CORSIA currently permits offsets to be bought for as little as a few dollars, and the absence of any international discussions on what if anything should succeed CORSIA after 2035, this assumption is not evidence-based. Without a high carbon price to drive reductions, emissions are likely to be far higher than predicted as there is no incentive to switch to cleaner technologies and fuels.

We acknowledge that greenhouse gas removals will be required to meet net zero but policy and investment is still in its infancy and yet, over the next 25 years, it is expected to supply aviation with around 20 MtCO2 reductions per annum.

## Review of the Airports National Policy Statement

**To what extent the provisions of the current Airports National Policy Statement (ANPS) approved by Parliament in June 2018 and designated under the Planning Act**

**2008 are supported by current evidence and projections on (a) aviation growth and (b) the climate and environmental effects of aviation and airport development;**

The provisions of both the ANPS and the accompanying appraisal of sustainability are largely based on out of date evidence from the Airports Commission report (2015) and the last DfT forecasts (2017). As the ANPS was approved before the COVID-19 pandemic and the legal commitment to net zero by 2050 (2019), the impacts are not currently taken into account by the ANPS. Projections of the environmental effects of aviation and of demand have both changed significantly in this time.

In terms of demand, the CCC's balanced pathway in CB7 results in 402 million passengers in 2050, a figure that is achievable within current capacity. Even under this pathway that limits demand growth, aviation is expected to be the highest emitting sector in the UK (alongside agriculture) from 2038 onwards.

The carbon budget of the carbon capped scenario in the ANPS uses an out of date CCC assumption of 37.5 MtCO2 in residual emissions in 2050, which is based on the pre-2019 80% emissions reduction target for the CCA08. CB7 and the Jet Zero Strategy have figures of 19.3 MtCO2 and 22.7 MtCO2, respectively, for residual emissions in 2050 to meet net zero. Lower residual emissions require tighter trajectories than assumed in the ANPS, with the interim targets of the Jet Zero Strategy set at 38.2 (2019, peak), 35.4 MtCO2 (2030), 28.4 MtCO2 (2040) and 19.3 MtCO2 (2050). There is also already a risk that we are not on track to meet these targets, with provisional estimates placing international emissions from aviation as slightly higher in 2024 than 2019 (roughly 37.4Mt).

There is now additional evidence of the effect of aviation via non-CO2 warming impacts. Non-CO2 warming impacts of aviation are estimated to be twice the size of historical CO2 emissions. The uncertainty over these non-CO2 impacts is falling as more research is added, with the 2021 paper by Lee *et al.* a key source published after the ANPS. Limiting demand is the simplest and clearest policy available for reducing non-CO2 and CO2 impacts together. Non-CO2 is not mentioned in the ANPS and is only briefly touched on in the appraisal of sustainability.

Evidence on the impact of ultrafine particles (UFPs) from aviation on health has also developed since the publishing of the ANPS. DEFRA published their air quality expert group report on UFPs in the UK in July 2018. As part of the WHO's 2021 air quality guidelines, four good practice statements on UFPs were recommended. Both of these recommend increased monitoring. There have been several key scientific publications after the ANPS that add to the evidence on UFPs from aviation, for example: Tremper *et al.* 2022, T&E 2024, Riley *et al.* 2021, Bendtsen *et al.* 2021, Zhang *et al.* 2022. This growing body of evidence urges caution over and better understanding of aviation UFPs as a major air pollutant with a significant negative impact on health.

**Whether the scope of the current ANPS remains appropriate given current and expected proposals for development of runway capacity and infrastructure at airports in the South East of England;**

Given the current context of aviation in the UK, the scope of the current ANPS is inadequate. For example, the ANPS is based on the statement: 'all major South East airports are expected to be full by 2040', however 3 of these airports have had expansions approved since then, with the Secretary of State minded to approve Gatwick's expansion plans. This statement was followed up by the conclusion from the Airport Commission (2015) that, 'there is a clear case for one net additional runway in London and the South East, to come into operation by 2030' - based on a single runway accommodating 200,000 movements per

year. The ~30 million combined additional passengers from approved expansions at London City, Luton and Stansted correspond to around 215,000[2] more movements per year already. Essentially, the capacity corresponding to a net additional runway has already been approved.

The ANPS is clear that expansion at Gatwick would have negative effects on Heathrow and the UK's global aviation hub status. The Secretary of State decision to be minded to approve expansion at Gatwick raises questions over whether there is evidence that this expansion can be carried out without harming Heathrow. Additional evidence is clearly needed over the interaction between the different expansion plans that have already been approved and any new proposals.The impact of approving the reopening of Manston airport for cargo traffic should also be considered. Freight capacity is listed as one of the key reasons for previously selecting the Heathrow Northwest runway scheme.

The COVID-19 pandemic has also affected the need for this capacity. Air traffic movements are still only at 2014 levels at 2.1 million, short of the 2.3 million total in each year from 2016-2019. This is despite there being 54 million more passengers in 2024 vs 2014. There are more passengers travelling on the same number of flights, limiting the case for additional capacity. At an airport level, demand projections have also become inaccurate. For example, Figure 2 in the Airports Commission Interim Report, projects that London City Airport would be full in 2024—there ended up being only ~49,000 movements despite a cap of 110,000 being allowed.

The impact of airspace modernisation plans should also be considered. The first iteration of the Airspace Masterplan outlined 'The potential projected benefits presented include a 30% increase in capacity to deal with 'expected levels of growth' across Southern UK airspace.' This interaction between airspace capacity and airport capacity needs examining.

**What conditions the Government ought to include in a revised ANPS to ensure that airport expansion can be delivered within (a) the UK's international climate commitments and statutory national obligations and (b) the UK Government's environmental targets for England.**

This is a key question to answer - as we've outlined above, currently the high bar of the 'material impact' test is almost impossible to prove, and therefore inadequate for ensuring that airport expansion is delivered within climate commitments and environmental targets. Serious consideration needs to be given to including a measurable test in the ANPS, and not merely relying on duties to merely "consider" climate commitments in the planning balance. Exploration of the impact of inclusion of IAS in carbon budgets on the ANPS is needed.

Proper assessment of the economic case for expansion is also needed, including estimates for the negative economic impacts of the effects expansion would have on the topics in the AoS (Community, quality of life, noise, biodiversity, soil, water, air quality, carbon, resources and waste). Updated assessments over the importance of business travel are also necessary. Business travel has also declined significantly since the publication of the ANPS.

**What appraisals of sustainability the Government ought to conduct in preparing a revised ANPS.**

[2] 295 mpp in 2024 with 2.1m ATMs = 140 pax per ATM
295 million/140 = 215,000

The Government has to carry out an AoS based on the draft NPS before it can be designated (Planning Act). The previous AoS is out of date in a number of ways. It does not assess the carbon impacts of the planes in flight, merely the impact of the construction and operation of the 3rd runway. It is not in line with the Environment Act 2021: "A Minister of the Crown must, when making policy, have due regard to the policy statement on environmental principles currently in effect." (Environmental principles policy statement here). The scope also needs updating as the current dates used are: 2014/15 baseline, 2020-2025 construction and 2025/26 opening year. The previous appraisal of sustainability lacked proper assessment of the negative impacts of the proposals in the ANPS. The AoS states that, 'The AC's Final Report notes that some of the consequences of aviation are not so positive'. This understates the negative impacts of the proposals—Of 111 appraisal questions (37 questions each for the 3 proposals) in the previous AoS, 89 were assessed as negative, 10 as neutral or mixed and 12 were positive (all of which were under the 'economic impact' topic).

The negative environmental impacts of the scheme need to be properly considered within the economic analysis. Previously, within the economic impacts topic, the total economic benefits figure was incomplete as it omitted lost revenue to producers. How the costs of any scheme are funded is a key question that an AoS should consider. The benefit to consumers of reduced ticket prices requires further analysis as the additional costs to producers (e.g. higher airport chargers), are likely to be passed on to consumers, reducing any ticket price benefits. Similarly with jobs: the AoS states: 'It has not been possible to demonstrate that the jobs generated locally will result in a net increase in jobs at a national level' + 'Even within the local economy, the number of additional jobs will depend on how many jobs are taken up by people who were previously unemployed. Some jobs may be taken up by the existing stock of workers'.

## Ensuring continued compliance with climate and environment obligations

**What arrangements ought to be made to keep airports and aviation policy under review to ensure that climate and environment obligations continue to be met;**

We do not recommend the use of planning conditions as a means to ensure climate and environmental obligations are met. Planning conditions have rarely benefitted communities/environmental protection, remaining in force until they become a constraint on operations at which point, airports usually come back to renegotiate the terms upwards. This is what we saw in Schipol airport in the Netherlands - when the airport exceeded a flight cap (to control noise) before the end of the year, the airport argued that it couldn't simply close down and was therefore allowed to continue operating.

There has been no history of applying conditions to control GHGs from aircraft at an airport level, so this approach is untested. However, the SoS for Energy Security and Net Zero, Rt Hon Ed Miliband, has in the past suggested a role for the CCC, CAA, and Environment Agency in assessing noise and emissions on an annual basis and only releasing new capacity according to whether the airport is operating within its limits. We are concerned that the industry will cite operational uncertainty as a reason to override this approach.

**What policy safeguards Ministers ought to offer to ensure that the climate and environmental impacts from domestic and international aviation continue to be mitigated in a way consistent with these obligations.**

We suggest that possible approaches could be:

- to ensure that IAS is included into Carbon budgets (as promised in 2021)
- To strengthen the language in the ANPS to avoid the nebulous phrase “Material impact”, instead replacing it with a concrete test.
- Comprehensive modelling of the emissions impact of expansion using a cumulative emissions framework.

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