Written evidence submitted by the Gatwick Area Conservation Campaign

Submission to Environmental Audit Committee call for evidence: Airport expansion and climate and nature targets

1. This submission is drafted by the Gatwick Area Conservation Campaign (GACC). GACC is a member of the No Airport Expansion Campaign Group which is a network of campaign groups and NGOs. More details about our group are available on website at https://www.gacc.org.uk/about-gacc.php.

Q1. The UK government must comply with the international commitment to stay within the 1.5C limit of post-industrial global warming, including that agreed internationally through the Paris Climate Agreement. The primary mechanisms for the UK to meet this internationally agreed commitment is through the UK Climate Change Act 2008 (as amended). The CCA 2008 includes the legally binding commitment for all emissions attributable to the UK (including aviation and shipping) to reach net zero by 2050, by meeting a series of interim Carbon Budgets. In addition, following the judgment of the Supreme Court in *R* (*Finch) v Surrey County Council & ors* [2024] UKSC 20 the Government must also take into consideration downstream emissions from aviation expansion. This includes a broader consideration than compliance with the CCA2008 and extends to non UK emissions caused by the airport expansion as well as the impact of non-CO2 effects of aviation – from now, not just by 2050. The Government must plan to stay *well within* its carbon budgets. Not risk exceeding them. For example, there is a significant risk that the future carbon budgets may be exceeded with the current reliance on sustainable aviation fuels and carbon capture and storage to be delivered at scale, as reflected in commentary from the UK Climate Change Committee (CCC) to Government.

The commitment to stay within international agreements to limit global warming to 1.5C should include the non-CO2 effects of aviation.

UK aviation strategy should also accord to the Precautionary Principle. This is accepted in UK environmental policy. It would require a risk-based approach rather than techno-optimistic approach for reducing UK carbon emissions in line with international climate obligations.

Q2. The commitment to include international aviation and shipping (IAS) emissions within the sixth and subsequent carbon budgets should be reflected in the decision making process for new infrastructure (including the planning process, Green Book, and cost benefit analysis methodologies) as well as mechanisms to limit emissions from existing approved capacity at UK airports.

Currently there is a lack of any holistic consideration of how planning decisions on new airport capacity is consistent with UK climate change commitments and no mechanism which enables such commitments to limit greenhouse gas emissions from existing aviation capacity.

There is a need to embed mechanisms to limit carbon emissions now and into the future at the individual airport level both for new (i) as part of planning and/or development consent orders related to expansions and (ii) for all existing airports. Government must have sufficient powers to ensure these limits are met. Currently the approach to date has been to 'predict' future improvements in efficiency and transition to sustainable fuels and then 'provide' new capacity, on the assumption that these predictions are realised. This approach has no guarantee of success. In addition, expanding emissions now at the promise of reducing emissions later is completely at odds with the carbon budgeting approach of the UK Climate Change Act, which sets limits on cumulative emissions. Stronger climate governance of the UK aviation sector is required as IAS emissions are mandated, rather than just monitored.

Furthermore, the lack of a comprehensive and up-to-date aviation policy results in an incoherent and haphazard approach to aviation expansion, allowing precious carbon budgets to be allocated for aviation expansion on a first-come, first-approved basis.

Q3. The CCC has clearly stated (Progress Reports to Government in 2022 and 2023) that no expansion of UK aviation should be permitted until a demand management framework has been put in place. Once such a framework is established, then constraint in demand should be able to constrain aviation, removing the need for additional growth. The UK should not permit aviation emissions aviation to increase at the expense of other sectors of the economy (the financial implications of which have not been costed). Instead aviation emissions should be planned to reduce in line with the overall carbon reduction trajectory of the UK and all other sectors. The UK should plan to be as *far below the carbon budget limits as possible*, not just to *meet/hit* carbon

targets. The crucial measure should be total cumulative emissions, inclusion of non-CO2 effects of aviation (contrails etc.), not (just) the emissions in any given year.

Q4. Airport capacity should, first and foremost, be planned to sit and stay well within UK carbon budgets. Instead of trying to justify expansion to meet (at least part of anticipated growth in) demand, aviation demand should be managed first within carbon budgets. There may be some change in the proportion of flights at different UK airports, but the cumulative emissions of aviation from all airports must sit within the UK carbon budget limits. The current planned and permitted airport expansions in the UK do not sit within UK carbon budgets. And these carbon budgets need to be 'right-sized' to accord to the latest climate science. [1]

Q5. The projections in Jet Zero and Jet Zero One Year On should not be accepted as an acceptable strategy to deliver aviation policy (ANPS and MBU) going forward because:

- The projections are not risk-based;
- No demand management mechanism is supported in the strategy; and
- It is little more than an attempt to justify 'prediction and provision' of additional capacity

The UK Government must develop plans for aviation capacity and demand management that accord with the UK climate and wider environmental commitments, not the other way around.

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[1] For example, Hansen et al conclude that equilibrium global warming for today's GHG amount is 10°C, which is reduced to 8°C by today's human-made aerosols. Equilibrium warming is not 'committed' warming; rapid phase-out of GHG emissions would prevent most equilibrium warming from occurring. But, under the present geopolitical approach to GHG emissions, global warming will exceed 1.5°C in the 2020s and 2°C before 2050. Impacts on people and nature will accelerate as global warming increases hydrologic (weather) extremes. The enormity of consequences demands a return to Holocene-level global temperature. Required actions include: (1) a global increasing price on GHG emissions accompanied by development of abundant, affordable, dispatchable clean energy, (2) East-West cooperation in a way that accommodates developing world needs, and (3) intervention with Earth's radiation imbalance to phase down today's massive human-made 'geo-transformation' of Earth's climate. Current political crises present an opportunity for reset, especially if young people can grasp their situation.

Hansen, J.E., Sato, M., Simons, L., Nazarenko, L.S., Sangha, I., Kharecha, P., Zachos, J.C., von Schuckmann, K., Loeb, N.G., Osman, M.B. and Jin, Q., 2023. Global warming in the pipeline. *Oxford Open Climate Change*, *3*(1), p.kgad008. https://academic.oup.com/oocc/article/3/1/kgad008/7335889?te=1&nl=david-wallace-wells&emc=edit_dww_20231108

Q6. GACC would agree with comments previously made by the Aviation Environment Federation (AEF) and the CCC with respect to:

a) assumptions regarding likely carbon reductions annually due to technological innovation, including use of sustainable aviation fuel. Specifically we note the CCC's comments in their Seventh Carbon Budget Report (February 2025) noting the limited delivery of CCS (BECCS or DACCS) to date, so the risky nature of this being relied upon for future carbon budgets, the overambitious estimates for SAF roll-out by the government, and the failure of current approaches, including increased use of SAF, to account for non-CO2 effects of aviation on global warming.

b) The international emissions trading schemes under CORSIA have done little to limit aviation emissions to date and no clear framework has been established for the future. This should not be relied upon as a mechanism to reduce UK carbon budgets until it has been formally agreed. The impact of the UK ETS should not be assumed to work, but be complemented by a wider suite of measures to manage demand for flights, both from the top-down (indirect measures, such as increasing cost, progressive taxation such as the frequent flyer levy) and bottom-up (such as limiting annual slot allocations at airports, contingent on reducing carbon emissions budgets for each airport being met each year.

c) The way in which airport operations might be changed to limit non-CO2 effects has not been properly explored or mandated, despite recent research in this area.

d) The CCC's Seventh Carbon Budget report highlights that by 2040 Aviation will be the largest emitting sector in the UK. This is unacceptable, as it highlights alack of ambition for carbon reduction for aviation, and likely increasingly unequal emissions across the UK population. Should such a level of aviation emissions be considered by Government, this would appear to breach equality and fairness standards, especially if the UK Government adopt income inequality as a protected characteristic as set out in the Labour Party's 2024 General Election Manifesto. Furthermore, the economic implications of the burden placed on other sectors of the economy to cut emissions faster and harder as a result of a lack of ambition in the aviation sector has not been quantified but is likely to be profound. The CCC's Seventh Carbon budget report highlighted that by 2050 around 60% of carbon removals in the UK economy are expected to be for aviation emissions. No plan was

set out in this carbon budget for what would happen if this level of carbon removal is not achieved. It would presumably require significant reduction in the scale of aviation. It would prudent, and in line with the Government's acceptance of the Precautionary Principle, for the UK to plan emissions for aviation that require carbon removals only in extreme circumstances. Carbon removals should be to allow negative overall emissions pathways to be achieved in developed nations and globally (as set out in the climate resilient development pathways of the IPCC), *not* to justify continuing emissions to occur, thus preventing carbon reduction at the pace and scale that the climate science indicates is required to avoid feedback mechanisms, and lack of control of the future levels of global warming and subsequent consequences (sea level rise, drought and flooding, reduced food growing land area and increasing magnitude and frequency of climate-magnified disasters etc.)

Q7. GACC consider the ANPS is out of date, not least because it was produced prior to the amendment of the Climate Change Act 2008 requiring the UK to achieve net zero by 2050, prior to the inclusion of international aviation and shipping in carbon budgets, and prior to repeated calls by the CCC for the UK government to cease airport expansion in the UK and to put a demand management plan for aviation in place.

Furthermore, the ANPS was based on evidence collated in 2013 before Brexit, the COVID-19 pandemic and the above legal and policy developments on UK climate change commitments.

The ANPS and the underlying evidence are therefore clearly out of date. Various policy statements suggest that the government will review the ANPS once Heathrow submits its proposal for a third runway.

However, in light of paragraph 1.21 of the ANPS and section 6 of the Planning Act 2008, GACC would expect the Secretary of State to review the ANPS prior to and regardless of whether Heathrow submits a proposal for a third runway.

8. As noted in Q7 above GACC is of the view that the current ANPS and the evidence on which it is based is out of date and should be reviewed in light of the latest climate science, changes in demand and work patterns as a result of the COVID-19 pandemic, overall UK carbon budgets, and the Precautionary Approach. The case for this to be expedited is amplified now that the UK government has ignored the recommendations

of is own Planning Inspectorate to not permit expansion of Luton Airport on climate grounds (granted April 2025). The scale of MBU proposals now significantly exceed that in government aviation policy (the expansion in Luton alone exceeds the 10 mppa referred to in the MBU policy, and is even more significant when the series of earlier airport expansions granted are included).[2]

The UK Seventh Carbon budget report by the CCC (February 2025) recommended that no more than a 2% increase in aviation capacity should be granted until 2035. Again, this points to a different approach to aviation policy going forward, one that focuses on where precious carbon budgets are most appropriately allocated in a climate constrained world.

9. The notion that 'airport expansion can be delivered within the UK's international climate commitments' is a flawed statement. This is only possible if SAF and CCS are both delivered at scale, before rather than after planned expansion of carbon emissions (so emissions do not rise in the short-term), and mitigations against the greenhouse warming potential of aviation's non-CO2 effects are accounted for. This question suggests that aviation expansion, and the type of economic growth and increased high-speed, climate damaging mobility that it facilitates, is a given and that its climate and environmental impacts can be mitigated and that governance arrangements can be put in place that deliver just that. Taking a precautionary approach and taking account of the latest climate science, this is not possible.

The ANPS should instead be revised to ensure that aviation capacity is not at odds with UK climate (and wider environmental) commitments. Aviation must play its part in achieving net zero, not disadvantage other parts of the economy by requiring them to cut faster and harder. A new policy framework is required, that is honest about the limits to aviation capacity needed to guarantee that international aviation emissions, and indeed overall carbon reduction commitments of the UK government are likely to be met. In accordance with the Precautionary Principle by ensuring that carbon budgets are at least met going forward, and noting that climate science is likely to require targets to be strengthened further going forward, then it would be prudent to plan to exceed the minimum levels of carbon reductions in the UK Climate Change Act.

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[2] For example, see https://www.aef.org.uk/uk-airport-expansions/.

10. A Strategic Environmental Assessment must comply with the principles set out in *R* (*Finch) v Surrey County Council & ors* [2024] UKSC 20, such that all direct and indirect effects of aviation expansion are considered, including all downstream emissions and the non-CO2 effects of aviation. The SEA should also consider how the scale and trajectory of passenger and freight movements in aviation (and shipping) can best deliver a zero carbon UK economy, and in doing so facilitate rather than frustrate delivery of zero carbon economies in other countries. This should be tested against the latest climate science and the precautionary principle to ensure that sector policy does not negate or frustrate national or international efforts to transition to a zero carbon future at pace. Any proposal that allows aviation not to stay in line with net-zero trajectories must at the very least consider the economic impact on other sectors of the economy required to do more to meet carbon budgets.

Expanding UK international aviation will encourage other countries to expand their aviation capacity. As one of the greatest historic emitters of Greenhouse Gases globally the UK should set out a position of climate leadership globally that discourages rather than further encourages aviation emissions elsewhere, by limiting them in the UK.

A wider Strategic Environmental Assessment should look at the mechanism by which the UK government (and other parts of the public sector) plan infrastructure investment that increases energy and material consumption, and increases the propensity for future greenhouse gas emissions. Expansion of infrastructure; such as aviation and shipping; tend to increase future intensity of resource use and lock-in high carbon patterns of living and development. The Green Book and government procurement (and planning) rules should be amended so that they are aligned to, and wholly within the scope of, UK carbon budgeting and climate action.

In light of this, GACC concurs with the CCC's comments referred to in the background note to this enquiry. Future infrastructure investments by government (including proposals to extend airport capacity) must make 'economic sense in a zero carbon future). The plans for economic development of the UK must fully accord with, and be planned to stay wholly within the UK's carbon budgets and the 1.5C commitment to limit global warming and avoid dangerous climate change.

11. There is a need to review and update aviation policy such that it leads (or at least remains up-to-date) with respect to UK climate policy and carbon budgeting. If there is

a lag in policy with respect to carbon reduction, achieving net zero and meeting carbon budgets should take precedence over the ANPS or any future aviation policy.

12. Mitigation of climate and environmental impacts should be safeguarded by a) linking policy to the precautionary principle, b) matching demand and supply-side measures and c) matching national policy with governance mechanisms that allow enforcement at an airport level.

a) Precautionary Principle. All policy should be developed in accordance with the Precautionary Principle. As noted in answer to Q1 the UK aviation policy should not have a low, or even the current high risk of failing to meet its carbon budgets, and therefore for the UK to fail to meet its international climate obligations. Instead, the policy must be resilient. It must help the UK to have a resilient pathway to zero carbon that is not predicated on unproven factors, or economic pressures that make it undeliverable, unrealistic or hopeful.

b) Demand Management. Setting scale of aviation capacity within a demand management framework should enable demand to be managed going forward, such that aviation remains in line with other sectors in delivering annual carbon reductions.

c) Slot allocation and future scale of flights at an airport level should be limited to ensure that national policy is realised in practice. The model for this explored and contested in the European Courts for Schiphol Airport should be applied to all UK airports to ensure the Government is able to ensure that demand is able to managed directly to complement the level of demand managed economy wide (such as with a Frequent Flyer Levy).[3]

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[3] See for example https://www.opportunitygreen.org/blog/schiphol-flight-cap-dutch-court-of-appeal.