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Sir Howard Davies  
Airports Commission  
Sanctuary Buildings  
20 Great Smith Street  
London SW1P 3BT

10 December 2013

Reference: WWF response to Emerging Thinking: aviation capacity in the UK

Dear Sir Howard,

Thank you for inviting comments on your speech of 7 October in which you presented your 'emerging thinking' on the UK's future airport capacity needs. WWF also appreciates the separate session you held for NGOs who are working on this issue, as well as the open and consultative approach you have taken in your deliberations to date.

Although WWF may disagree with many of your conclusions, on the whole we see much of merit in your analysis. The Commission has indeed 'improved the quality of the debate' and we are grateful for your willingness to listen to all points of view, including giving serious consideration to our evidence and that provided by other charities. We are also pleased with the level of importance you have attached to aviation and climate change and to making any airport expansion compatible with meeting UK climate targets. In the spirit of continued constructive engagement with the Commission's work, WWF would like to respond to the following four points raised in your speech:

1. **Future growth requiring expansion:** Although you acknowledge the over-optimism of recent DfT forecasts, you disagree that aviation demand is maturing in the UK. WWF would be interested to see the evidence that supports this position. Your speech seemed to imply that this growth in demand could be externally driven, for example by faster growing economies flying more to the UK, but this is open to speculation. Our view is that while there will be some growth in UK air traffic from emerging economies, this will not be anywhere near the levels (4 million passengers per year) hoped for by those such as the Transport Select Committee. We would like to see more evidence for such projections. We agree that more routes to emerging markets are needed but believe that these can be, and are already being added (for example at Heathrow, Gatwick and Birmingham), within existing capacity.

While WWF agrees that aviation growth is likely to continue, our view is that the future rate of growth is likely to be at far lower rates than previously, at the lower end of the DfT forecast range (around 1% per year), based on the static growth rates seen



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since 2007, maturity in low cost leisure flights, increasing ticket prices and reduced business flying, which we believe is here to stay. At such low rates of future growth, even the DfT estimate that the UK could have enough airport capacity until 2040.

As you know, WWF is not persuaded that further expansion is needed, beyond the 60% growth in passengers and 55% increase in ATMs recommended by the CCC, which we believe can be accommodated within existing airport capacity, as demonstrated in the airport capacity analysis we have already provided to the Commission.

([http://assets.wwf.org.uk/downloads/airport\\_capacity\\_report\\_july\\_2011.pdf](http://assets.wwf.org.uk/downloads/airport_capacity_report_july_2011.pdf))

2. **The ability of new technologies and lower carbon travel alternatives to replace flights:** WWF is disappointed in the Commission's emerging view that new communications technologies including tele- and video-conferencing, although having some value to business, have only limited potential to replace flying. We believe it is important for the Commission to proceed on the basis of evidence, and we would be interested to hear more about why the Commission is not convinced by the evidence we have presented so far.

We continue to be strong proponents of alternatives to flying and our latest One in Five Challenge results are even more impressive and show long term corporate commitment to reducing their reliance on flying to save money and carbon, while remaining profitable and competitive. Our evidence and case studies show that technology can replace 30% of company flights to business meetings. That is equivalent to freeing up roughly 10% of capacity at Heathrow (30% of the 30% of Heathrow passengers that are flying on business). We have also sent further examples of academic research to Edward Pertwee to back up our own evidence base of the increasing use of technology among large UK corporates. We hope you will consider this carefully.

We consider that substantially increased use of video-conferencing and tele-conferencing is a win-win-win for airport capacity, business costs and the environment. We believe the evidence is robust and compelling. We would welcome some strong recommendations from the Airports Commission in its interim report on this topic, and are eager to do everything we can to convince you.

We accept that video-conferencing is unlikely to replace leisure flights, but continue to argue that it is feasible for many short-haul leisure and business flights to be replaced by improved rail networks. We are concerned that there seems to be little analysis or acknowledgement from the Commission of the potential of rail, including high-speed rail, to replace domestic and short haul flights. According to analysis done by AirportWatch, such train journeys could replace 25% of flights at UK airports (*Aviation and climate policy in the UK*, 2011 ). Once again, we would be interested to know what evidence the Commission has considered on this point, and hope to see an informed discussion of it in the interim report.

3. **Limited ability for slot allocation reform:** As per our letter of 17 July, following our oral evidence session with the Commission, WWF remains of the view that slot allocation reform, although not easy, can be achieved with sufficient political will. We

note your argument that low cost carriers have been the ones who have made best use of spare capacity in the past but other sectors of the market may not be able to do so. This is one of the reasons you say we need more capacity. However, we question the logic of this as you also say that more than 20% of low cost traffic is now business related, thus helping to move business demand to less congested airports, solving at least part of the problem of over-congestion at Heathrow.

4. **Climate change:** WWF welcomes and fully agrees with your statement that it would not be responsible for any government to plan major airport expansion without a plan to significantly cut aviation emissions. We also appreciate the efforts that the Commission is making to liaise closely with the Committee on Climate Change and to take on board its recommendations for aviation, if it is to contribute its fair share to meeting UK climate targets.

However, the DfT's central aviation emissions projection for 2050, at 47 MT CO<sub>2</sub>, is already far in excess of the 37.5MT CO<sub>2</sub> emissions level recommended by the CCC. Since the DfT's forecasts and the CCC's limits are incompatible, the Airports Commission therefore needs to come up with some way of reconciling these, or accept that capacity constraint is needed – either instead of, or in addition to, any expansion. Your 'emerging thinking' so far does not appear to have tackled this point which is at the crux of the debate.

As you have recognised, this is further complicated by the lack of fully functional regional and international frameworks to regulate aviation emissions—and, as you say, we need a mechanism for managing the carbon impacts of aviation if the UK is to achieve its statutory carbon targets, with or without expansion. However, in recent weeks, the scope of aviation in the Emissions Trading Scheme has been further restricted and the prospect of a future global deal for aviation through ICAO is still far from guaranteed. Neither of these developments bodes well for providing a basis for 'offsetting' UK airport expansion—making it even more difficult for the Commission to 'square the circle' of airport expansion in a way that is consistent with meeting climate targets. WWF supports your efforts to do so—but we doubt that it is possible.

We agree with you that the airline industry's failure to achieve major advances in fuel efficiency (and thereby reduce emissions intensity) will place pressure on the rest of the economy to achieve further carbon reductions in order to meet our carbon budgets. You also admit you do not see any transformational changes by the industry on the horizon. Combined, these two observations mean there is a very real risk of even higher levels of decarbonisation by the rest of the economy. WWF appreciates that you are strongly aware of this issue—but we see this as another reason for being cautious about airport expansion.

In summary, although we are disappointed by your view that some expansion will be needed, we are encouraged by the Commission's diligence and willingness to consider the climate impacts of aviation—and your insistence of keeping any expansion within UK climate targets.

We look forward to further discussions with you in coming months and will be inviting a representative of the Airports Commission to attend a corporate event to celebrate the achievements of the One in Five Challenge, which will be held at our new Living Planet Centre in Woking in the New Year.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'J Leston', with a long horizontal flourish extending to the right.

Jean Leston  
Transport Policy Manager