



Via E-mail:

climatechange.paper@airports.gsi.gov.uk

Date: **17 May 2013**

Dear Sir or Madam

**AVIATION AND CLIMATE CHANGE DISCUSSION PAPER
RESPONSE FROM LONDON BOROUGH OF HILLINGDON**

Thank you for referring the Aviation and Climate Change Discussion Paper to us for comment.

The comments provided are largely in response to the following question posed on page 35 of the consultation document:

What do you consider to be the main climate risks and adaptation challenges that the commission will need to consider (a) in making its assessment of the UK's overall aviation capacity and connectivity needs, and (b) in considering the site specific options to meet those needs?

Emissions Targets

The overall aim of the paper is provide a discussion into how best to manage emissions from the UK's aviation emissions. Effectively, this has already been undertaken and reported to Government by the Committee on Climate Change (CCC) in 2009. In the first instance, the Council is deeply concerned that the evidence presented by the CCC has not yet resulted in positive action and particular with regards to setting UK binding aviation specific emissions targets.

Planning Specialists

Resident Services

T.01895 558326

ithynne@hillington.gov.uk www.hillingdon.gov.uk

London Borough of Hillington,

Location, Civic Centre, High Street, Uxbridge, UB8 1UW



INVESTOR IN PEOPLE

It is also worth noting that the recommended CCC targets were cited as reason to rethink the aborted third runway proposals at Heathrow.

The Council is therefore concerned that the Government is still stalling on adopting an emissions target for aviation and instead taking a reactive 'wait and see' approach as opposed to taking strong leadership.

Furthermore, the Council is concerned that the Government appears to be heavily behind airport expansion despite the absence of clear strategic planning for climate change. The approach to the third runway should have provided a valuable lesson in how climate change should not be ignored and what happens if it is ignored. It seems that the Government has not heeded this lesson and is preparing an approach to aviation capacity growth (reflected in the TSC's suggestion of a new four runway hub at Heathrow) in lieu of a clear understanding of what is required to be achieved regarding climate change.

General Comments: European Emissions Trading Scheme (EUETS)

The Council supports the inclusion of aviation in the EUETS but is mindful that this is currently 'on hold' and its benefits heavily debated in any case. The EUETS for aviation has been highly complicated to set up and resulted in challenges by nations outside of the EU. It has never properly been implemented; even implemented as intended, the price and availability of carbon credits means the impacts on emissions are highly questionable. The Government has not presented a robust evidenced based assessment of the realities of what the EUETS will do.

It is therefore a concern that the Government is placing considerable faith in the EUETS without fully understanding the likely impacts. It should also not detract from the Government taking strong leadership and adopting the approaches advised by the CCC.

It is therefore a concern that the Government is proceeding with assessing aviation options (TSC recommendations on Heathrow) without understanding the constraints climate change will have on any future decision. It is also premature for the Commission to ask for solutions to capacity growth, without fully understanding the climate change constraints on delivery.

The Government should either hold off any thoughts of aviation capacity until the climate change agenda is properly understood; alternatively, the Government should adopt its own proactive emissions reduction target and agenda and not wait to see what happens elsewhere.

General Comments: High Speed 2

The TSC's appraisal of the recent High Speed 2 proposals suggested the Government urgently develop a clear integrated transport strategy. This has still not been completed, and proposals for High Speed Rail continue to be advanced alongside the Davies Commission's consideration of aviation.

The commission has to be aware of the evidence submitted as part of the initial HS2 Phase 1 consultation into green house gas emissions. This presented a scenario that HS2 would have significant adverse impacts on emissions if there was a modal shift from domestic air to the new high speed network. The Government's unwillingness to control and manage slots, means the freeing up of domestic slots in favour of high speed rail journeys, will invariably lead to more long haul flights. Consequently emissions could go up despite the Government's assertion that high speed rail is a 'green' infrastructure project.

The Commission therefore needs to be fully mindful of the current management regime for airports and the lack of influence the Government has on managing slots. The consequence of this is that seemingly low carbon transport measures such as HS2, could ultimately lead to the UK contributing more emissions because of an inability to control and freeze flight slots.

Crossrail 2

The TSC recently advised that a four runway hub proposal should be considered at Heathrow. One of the reasons cited was that capacity is urgently needed, but growth at other airports was not appropriate because of the lack of connectivity.

For years the Government has focussed solely on Heathrow at the expense of other London serving airports. Crossrail 1 amongst other infrastructure proposals were not planned with aviation in mind, and consequently improved connectivity particularly to Luton, Gatwick and Stansted has been ignored. This lack of attention to other airports apparently leaves the Government with no choice (as implied by the TSC) but to expand Heathrow despite significant environmental and social problems which are given less weight than economic growth.

The lack of attention to serving other London airports is further highlighted in the recent Crossrail 2 consultation. This included a "Regional [route] Option" that would go from the north east of London to the south. However, this route finishes approximately 15 miles south of Stansted, and 13 miles north of Gatwick. A joined up approach to aviation and rail in particular could have seen one, if not both considered for greater connectivity.

This highlights once again the failings of not having an integrated transport strategy, the lack of willingness within Government to think away from Heathrow and how best to manage existing capacity without the need for carbon intensive new proposals.

To avoid similar errors made with regard to the Third Runway proposals, the London Borough of Hillingdon strongly recommends that approaches on climate change are fully established prior to considering capacity solutions.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ian Thynne', written in a cursive style.

Ian Thynne
Principal Sustainability Officer