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**Consultation on shortlisted options for a new runway
Response from Friends of the North Kent Marshes**

Friends of the North Kent Marshes is a voluntary group, formed in 2004 out of the No Airport at Cliffe Campaign Liaison Group, following the successful fight against the proposals for an airport at Cliffe. The North Kent Marshes stretch from Dartford in the west to Whitstable in the east and include the Hoo Peninsula, the River Thames, the River Medway, the Swale and Isle of Sheppey. They are some of the most unspoilt landscapes in Kent and are very rich in wildlife. Our aim is to promote the Marshes and the ways in which everyone can enjoy them. We work both with the local communities that live on and around the Marshes, and with groups such as the RSPB as they develop flagship visitor sites here. The area faces many threats as pressure for land and development in the southeast continues. We welcome the opportunity to make our voices heard in this important debate by taking part in this consultation on shortlisted options for a new runway.

We do not support aviation expansion be it anywhere in the Thames Estuary, Lydd or elsewhere. We believe that the demand for flights should be managed and the current Government policy on airports should be revised away from the 'predict and provide' expansionist approach of the last decade that threatens the climate and important wildlife sites. There must be a moratorium on air travel expansion until it can be demonstrated that significant increases in emissions from air-travel can be accommodated within a UK cut of 80% in emissions by 2050, as enshrined in law by the Climate Change Act (2008). Without this, the scale of the cuts required in the rest of the UK economy to offset a continuing rise in aviation emissions would be potentially crippling. Instead, demand for flights should be managed by encouraging the use of lower carbon modes of transport and the removal of the substantial subsidies that the industry currently enjoys including tax-free fuel, and the absence of VAT on all aspects of aviation.

The climate change implications of airport expansion.

Climate change remains the greatest threat to mankind and biodiversity and we believe that there should be no further airport expansion. Emissions from aircraft are one of the fastest increasing sources of greenhouse gases. Unchecked, climate change may see up to a third of land-based species committed to extinction by regional climate change effects by 2050. The impacts of climate change on wildlife in the UK and abroad are already being felt.

Importantly we draw your attention to the following:

- In April 2014 the Intergovernmental Panel on Climate Change issued its report to policymakers on the 'mitigation of climate change' a summary of which can be found here <http://www.ipcc.ch/> A more detailed report for policymakers can be found here

http://report.mitigation2014.org/spm/ipcc_wg3_ar5_summary-for-policymakers_approved.pdf

The key point of this report is that the expansion of the emissions from the aviation sector is not only incompatible with UK's 2008 Climate Change Act, the report from the IPCC makes it clear that policymakers need to reduce emissions in all sectors as a matter of urgency. There is no room left to expand polluting activities like aviation.

- A report by DARA Climate Vulnerability Monitor 2nd Edition (<http://daraint.org/climate-vulnerability-monitor/climate-vulnerability-monitor-2012/>) estimates that climate change causes deaths on average each year today, of 400,000 people per annum and that together the carbon economy and climate change related losses cost the global economy \$1.2 trillion every year.
- RSPB report 'Aviation, climate change and sharing the load'
http://www.rspb.org.uk/Images/aviationclimatechange_tcm9-372504.pdf

"Key messages

It is essential that aviation contributes its fair share to our overall climate change goals. However, we are currently on course to fail to meet our climate change target for aviation and likely our overall goals as there are no controls on emissions from international flights.

An international agreement being reached to control aviation emissions is far from certain. Direct unilateral regulation of aviation in the UK would be exorbitant (up to £600/tonne of CO₂) and therefore politically unfeasible.

All of the guidance we have on emissions from aviation is based on the world as we would like it to be (with controlled emissions) rather than as it is (without).

Controlling airport capacity is the only viable policy lever available to the UK government to directly restrict aviation emissions in the absence of a trading scheme.

Uncontrolled expansion of aviation emissions will have a significant impact on the UK's ability to meet its carbon targets. Our best current estimate is that not controlling aviation emissions would penalise the rest of the economy with a potential cost of between £1 billion and £8.4 billion per year but the real cost is probably higher.

We need:

New open dialogue on the climate change implications of aviation expansion so that all stakeholders fully understand the implications.

The Government's Department for Transport to run models to show what will happen to emissions if we continue without emission controls.

For any expansion in airport capacity to be contingent upon there being international agreement on effective controls on aviation emissions"

RSPB "estimate that if aviation is neither regulated nor capacity constrained then by 2050 the extra carbon emitted may be significant. In order to stay within our carbon budget obligations other parts of the economy will have to be in the order of £1 billion to £8.4 billion per year, and potentially much more. This is in the context of other sectors already significantly reducing emissions to stay within our legally binding emissions limits. We need better research to fully understand the scale of this impact."

4. Policies to limit aviation emissions are “woefully inadequate” according to a recent paper [All adrift: aviation, shipping, and climate change policy by Dr Alice Bows-Larkin](#) of the [Tyndell Centre](#) for climate research. The study concludes that the only realistic way of ensuring that international aviation plays its part in reducing emissions is to manage passenger demand. This finding is in line with research by the [University of Southampton](#), and with the Committee on Climate Change’s conclusion that UK air passenger numbers must rise by no more than 60% in order to meet the requirements of the Climate Change Act.

This paper compares international aviation policies with shipping policies and highlights the need for mitigation measures to be urgently accelerated to ensure the sector plays a role in meeting the global ‘2°C’ pathway.

We have grave concerns about the Commission’s approach to analysing the climate change implications of airport expansion.

1. Forecasts

The Airports Commission has produced its own forecasts of carbon dioxide emissions from aviation that are lower than official forecasts from the Department for Transport. No explanation has been provided for the discrepancy, which applies both to national level forecasts of aviation and to the anticipated (no new runway) ‘[baseline](#)’ emissions for Heathrow and Gatwick.

We are concerned about the reliability of the Commission’s forecasts of emissions from a new runway and ask that the Commission explains why its CO₂ emissions forecasts are lower than the Government’s latest forecasts, what assumptions have been made and how sensitive the results are to them before publishing its final report.

2. Policies to reduce emissions

Even with lower emissions forecasts, the Airports Commission’s own work has shown that building a new runway would be inconsistent with UK climate change commitments unless new, unspecified action was taken by Government to cap aviation emissions.

The sustainability assessment for each short-listed scheme predicts that national aviation emissions would be higher than the level consistent with the Climate Change Act if the runway scheme proceeds, even if aviation is included in a carbon trading scheme.

The Commission has claimed that working out what additional policy action would be needed to limit emissions ([new taxes](#) or [planning restrictions on other airports](#), for example) is outside its remit, as is, indeed, assessing the likelihood that even carbon trading policies will be successfully extended to cover aviation.

We ask that the Commission sets out in meaningful detail what policy developments would be required in order to limit emissions to the aviation cap while building new capacity.

3. Economic analysis

The economic analysis of the shortlisted expansion options does not include the economic costs of restraining greenhouse gas emissions from UK aviation to a level compatible with the Climate Change Act.

The Committee on Climate Change, the Government's official climate advisers, told the Airports Commission in an open [letter](#) in 2013:

"Given the need to limit aviation demand growth in a carbon constrained world, we recommend that this should be reflected in your economic analysis of alternative investments. For example, for each investment, you should assess whether this would make sense if demand growth were to be limited to 60% by 2050."

The Commission has not completed this analysis, citing technical difficulties and the fact that the carbon component (costs associated with restraining emissions) "would dominate the capacity appraisals". The Airports Commission's estimates of the economic benefits that would arise from each of its shortlisted schemes are therefore misleadingly high. The admittance by the Airports Commission that it has not included the 'carbon costs' in its economic analysis is on page 25 of the consultation document.

We ask that the Commission fully includes the economy-wide cost of keeping national aviation emissions to within 37.5 Mt in its cost benefit analyses, in line with the recommendations of the Committee on Climate Change. This analysis should be presented prominently in the final report.

Ours is the marsh country down by the river, within, as the river winds twenty miles of the sea and we will never give up the fight to protect our globally important wildlife sites and our communities here in the Thames estuary.

We thank you for reading our submission and trust that our grave concerns will be taken into account.

Yours faithfully

Friends of the North Kent Marshes

