

Airports Commission Consultation

RSPB Response

Summary

The RSPB's approach to the aviation sector is led by two principles: that all development should avoid unacceptable harm to wildlife and that the UK must continue on the path to meeting its carbon budgets, as legislated for in the Climate Change Act 2008. This submission should be read in the context of the all of the RSPB's previous submissions to the Airports Commission.

Regarding this particular consultation, the RSPB is concerned that:

1. The proposed options for Heathrow expansion could adversely affect nearby Sites of Special Scientific Interest and Special Protection Areas.
2. The Commission does not fully spell out the implications of its carbon analysis and that this could lead to ill-informed decisions that could undermine the UK's ability to meet its legally binding climate change commitments.

Background

The Royal Society for the Protection of Birds (the RSPB) is the largest wildlife conservation organisation in Europe. We have 1.1 million members, and own or manage approximately 135,000 hectares of land for nature conservation on 200 reserves throughout the UK.

The RSPB considers that sustainability should be at the heart of decision-making. Human-induced climate change is the greatest long-term threat to society and to global biodiversity. Rapid and deep emission cuts in all sectors are essential to avoid dangerous climate change. An urgent challenge for the UK is therefore to tackle rising carbon emissions, from transport and aviation. The Committee on Climate Change (CCC) says that at least a 60% cut in overall domestic emissions is needed by 2030 to be on the path to secure a 90% cut from the wider economy (equivalent to at least 80% once emissions from international aviation and shipping are factored in) by 2050¹.

It is therefore essential to ensure that the aviation sector makes a fair contribution towards meeting the UK's overall climate change targets. Since the UK airport system, in terms of planning permissions granted, is already close to the maximum number of passengers compatible with achieving the 2050 target, any growth in the sector should only be permitted when the industry has demonstrated that such growth is possible within emission limits that reflect the carbon budgets.

Any new airport development must be clearly compatible with UK carbon budgets and must avoid all unnecessary damage to places of high ecological value, particularly protected areas.

¹ Committee on Climate Change, *Meeting the UK aviation target – options for reducing emissions to 2050*, December 2009

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

Either of the proposed Heathrow options is likely to bring the airport considerably closer to the reservoirs located to the south of the airport and to the west of the M25. Many of these reservoirs have been designated as part of the South West London Waterbodies Special Protection Area (SPA) and the South West London Waterbodies Ramsar site. These two designations are underpinned by 4 Sites of Special Scientific Interest (SSSI).² Neither Heathrow option would be connected with or necessary for the management of the SPA or Ramsar site, so would need to undergo a formal assessment under the Conservation of Habitats and Species Regulations 2010 (as amended) (“the Habitats Regulations”).

The potential impacts from the extension of Heathrow Airport in the manner proposed would be likely to go beyond the “footprint” of the airport itself. Relevant effects on the SPA/Ramsar sites may be direct (e.g. direct loss of habitat) or indirect (e.g. eutrophication due to increased NO_x emissions). They may also arise from operations outside the boundary of the protected site (e.g. changes to drainage systems, bird strike risk management). The extent to which any such effects can be removed or reduced by mitigation measures will vary and the proximity of either airport extension to the protected areas is likely to make mitigation more difficult to secure. Key impacts that would need to be considered include:

- **Indirect land take of SPA/Ramsar/SSSI habitat through measures to control bird strike hazard within the 13km safeguarding zone**
 - Evidence from the Lydd airport proposals recognised that dawn and dusk movement of wildfowl and gulls was an example of an acute hazard. In order for any bird management strategy to be effective it is likely that Heathrow airport would need to seek additional direct control over areas outside the airport perimeter they consider to pose the greatest risk of bird strike, and the potential impacts of active bird hazard management both inside and outside the airport perimeter would be to increase greatly the effective “bird free” area.
- **Noise, light and air pollution**
 - Noise impacts upon birds resulting from aircraft movements, engine testing and other noise sources at airports. This could cause disturbance or displacement to the birds dependent on the protected sites.
 - Airport lighting is likely to have impacts on birds, particularly birds flying at night. A 2006 literature review of the ecological impacts of artificial lighting concluded that “all evidence indicates that the increasing use of artificial light at night is having an adverse effect on populations of birds, particularly those that typically migrate at night.” Lit structures can attract migrating birds resulting in collision.
 - Pollutants are likely to come from the exhaust gases from aircraft, the supply/support/maintenance facilities for aircraft on the ground, evaporation from fuel

² They are: Staines Moor SSSI, Wraysbury and Hythe End Gravel Pits SSSI, Wraysbury No. 1 Gravel Pit SSSI, and Wraysbury Reservoir SSSI.

depots and storage tanks, and road traffic generated by airports, and include: VOCs, NOx, ground level ozone, particulate matter, carbon monoxide and sulphur dioxide.

- **Human disturbance from increased human population in previously undisturbed areas**
 - There will be considerable additional vehicle movements associated with the expansion of the airport itself but also with the people arriving at the airport to catch a plane. Taken together these vehicle movements could significantly increase the noise and disturbance around the airport footprint.
 - Many wintering waterbirds require open sightlines to enable the early detection of predators. New development that removes uninterrupted views has the potential to 'disturb' these species.

In order to be able to properly evaluate these potential impacts upon the designated sites it is essential that thorough baseline information about the bird use of all of the constituent water bodies is gathered, including those such as The Queen Mother Reservoir that are not currently designated but which may be used by birds from the designated sites. This baseline information should include a minimum of 3 years of survey effort. We are aware that most of these bodies are already covered by the Wetland Bird Survey (WeBS) so that, subject to suitable intensity of existing surveying, it may be possible to use this information to form at least part of the baseline data.

The RSPB expects that any proposal would be subject to Regulations 61, 62 and 66 of the Habitats Regulations. If an adverse effect on integrity of the SPA/Ramsar cannot be avoided, the Government would be required to demonstrate that there are no less damaging alternative solutions to meet the UK's public interest objectives in the aviation sector, including meeting the UK's carbon emission commitment.

Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?

The Commission's technical analysis has been thorough and technically impressive. We are grateful for the Airport Commission's technical expertise, hard work, efforts to consult widely and the breadth of the analysis in the sustainability assessment. We are, however, concerned that the Commission's carbon emissions analysis does not fully spell out the results of its analysis for policy-makers and could therefore result in decisions that are ill-informed and undermine the UK's ability to meet its carbon budgets.

Carbon regulation in aviation remains a complex, unanswered and politically live topic. Whilst the Airport Commission's reports are accessible in terms of understanding the raw results, they do not always spell out the implications for policy-makers.

For instance, in the interim report it appeared that in the carbon-capped scenario the carbon price required without expansion was half that with expansion. This price differential would seem to suggest that it would be harder to attain the UK's target by 2050 if we expand than if we do not. Those earlier figures were not based upon one extra runway but on no capacity constriction overall and this too would be a useful message.

it will be vital to the debate that will follow for the final report to include a short section, or even a separate briefing document, which briefly describes the current policy context:

- The ICAO process
- The EU ETS and 'stop the clock'
- Options for UK only processes implied in the "capped" scenario.
- The limited room for other UK industries to achieve decarbonisation above 85%.

The final report should also dispel some myths such as that technical improvements will deal with carbon emissions without the need to regulate.

The report should also summarise the findings of the modelling work including the projections without regulation. The Commission's work should describe how expansion of airport capacity can remain compatible with the UK's carbon budgets in a situation without new or additional regulation.

Carbon Traded Prices Used

We are concerned that the prices used in the carbon-traded scenario may not entirely reflect what is planned by ICAO (particularly given the recent extension of the EU ETS 'stop-the-clock' decision on inclusion of aviation emissions). This extension was a significant change in policy regarding aviation emissions trading.

The ICAO process documents suggest that any global market in aviation carbon would:

- Have very different carbon targets to the EU ETS (halt emissions at 2020 levels)
- Preclude trading with other industries
- Be likely to have sizeable exemptions for carriers based in developing countries

As a result it might lead to very significantly different carbon prices throughout the next decade. It might be useful to have some qualitative discussion of what might happen and how this might impact upon carbon emissions and aviation demand.