



# JOINT POLICY PROPOSALS FOR A SUSTAINABLE FUTURE AVIATION STRATEGY

## September 2014

As environmental groups, we welcome the fact that over the last decade, climate change and other environmental impacts have become major considerations in aviation policy. We note that the debate has moved from the threat of five potentially damaging new runways to a proposal for one. This step change has been influenced by the recognition that new runways would represent locking into carbon-intensive infrastructure at a time when the UK urgently needs to reduce emissions. It is critically important that climate change targets continue to be respected in the context of aviation expansion.

With this in mind, we highlight that building a new runway in the South East would rule out expansion elsewhere in the country and require caps on regional airports. Meanwhile, locking in higher carbon emissions from aviation would require a tightening of carbon budgets for emissions elsewhere in the economy such as carbon-intensive industry.

As environmental groups with concerns for wildlife, climate change, sustainability and society, we would oppose airport expansion or the construction of any new runways unless any future government ensures the following tests are passed. We are calling on all political parties to include the tests in their manifestos.

### 1 Ensure Climate change commitments are not compromised by aviation growth

- Put in place regulation to ensure UK aviation emissions will not exceed 2005 levels by 2050
- Include the UK's international aviation emissions in the five year carbon budgets leading up to 2050
- Push for international limits on aviation emissions at least as stringent as the national aviation cap specified above
- Keep the evidence on non-CO<sub>2</sub> impacts under review and tighten the aviation cap if required

### 2 Limit the impact of aircraft noise on both health and quality of life

- Do not permit new runways at airports where aircraft noise in residential areas exceeds World Health Organisation recommended levels, or where it could threaten tranquillity or negatively impact on vulnerable species and sites
- Publish, consult and rigorously appraise evidence on potential changes to flight paths and flight frequency before any expansion decision, considering health-based impacts and the additional level of disturbance that aircraft can cause where background noise levels are low

### 3 Protect public health by upholding and toughening air pollution laws around airports

- Adhere to the principles of the EU Directive that air quality (i) can not be allowed to breach legal limits (ii) must not be worsened and (iii) should not be allowed to deteriorate in areas where it is within legal thresholds
- Revise the air quality legal limits in the long-term to reflect WHO guideline levels and reduce air pollution around airports to these levels

### 4 Examine all local environmental and social impacts of airport expansion, and refuse expansion if the likely impact is unacceptable, including the following issues:

- Protected habitats and species
- Water quality
- Character of the countryside
- Irreplaceable ancient woodland
- Protected sites
- Public safety zones

### 5 Give preference to using existing airport capacity

- Utilise regional airports ahead of building new capacity given its associated risks and environmental impacts

### 6 Ensure full parliamentary scrutiny and debate

- Carry out a parliamentary debate in the main chamber about the consistency of the Airports Commission's recommendations with the above environmental tests prior to any decision to expand

# SUPPORTING NOTES

## 1 Ensure Climate change commitments are not compromised by aviation growth

### a) Cap CO<sub>2</sub> emissions at 37.5 Mt

The Committee on Climate Change (CCC) advises (as reflected in the Airports Commission's Interim Report) that 37.5 Mt CO<sub>2</sub> is the appropriate level to set aside for aviation by 2050 in order to avoid breaching the UK's overall legal target of reducing greenhouse gas emissions by 80%<sup>1</sup>. Currently, however, government does not specify an aviation emissions cap and there is no plan to regulate aviation emissions consistent with the target.

The EU Emissions Trading Scheme was intended to be the key method for controlling aviation emissions but it has been severely weakened, now only covering 25% of aviation emissions from the EU. Instead, there is a distinct possibility of a much weaker international system to reduce emissions being designed by the UN aviation body, ICAO, which still faces significant challenges from the major growing economies. Such an international scheme would be unlikely to be sufficient to deliver the cap assumed in modelling by both the Airports Commission and CCC.

Investing heavily in airport expansion before controls on emissions are in place will only make it harder to put in place the regulation necessary to reduce emissions<sup>2</sup>.

Any future government should formally cap aviation emissions at 37.5 Mt CO<sub>2</sub> by 2050, with the option of further tightening this over time given that aviation emissions would, at this level, represent a quarter of total UK greenhouse gas emissions in 2050. Policy to control emissions must be in place before any expansion is permitted.

### b) Include aviation emissions in carbon budgets

While emissions from international aviation are allowed for in legislated carbon budgets, they are not formally included. The next government should demonstrate its commitment to upholding the integrity of the Climate Change Act by formally including aviation emissions when the issue is reviewed in 2016.

### c) Push for international limits on aviation emissions

As stated above, binding controls are needed on aviation emissions, both domestically and internationally. The UK should push for an international cap on aviation emissions that is at least as stringent as the national cap of **absolute** aviation emissions being no higher than 2005 levels in 2050. International efforts to tackle aviation emissions are likely to include a form of market based mechanism at a global level and therefore we support the EU continuing to push for stabilising **net** aviation emissions at 10% below 2005 levels, as well as initiating discussions towards a long-term global 2050 goal.

### d) Review non-CO<sub>2</sub> impacts

Evidence of the non-CO<sub>2</sub> impacts from aviation on climate change suggests that emissions at altitude of gases other than carbon dioxide could double the warming effect of aviation. However, an appropriate metric for incorporating this evidence in policy is not yet agreed. Aviation's non-CO<sub>2</sub> impacts should be regularly reviewed and the 2050 target for aviation adjusted to take account of these impacts when possible.

<sup>1</sup> Committee on Climate Change (2009) *Meeting the UK aviation target – options for reducing emissions to 2050*

<sup>2</sup> RPSB (2014) *Aviation Climate, Change and sharing the load*

## 2 Limit the impact of aircraft noise on both health and quality of life

### a) Set a long term target to achieve WHO noise recommendations

Evidence of the impacts of aircraft noise on health, notably the impact of night noise on rates of heart disease, strokes and dementia, has increased in recent years. Any future government should commit to achieving health-based limits on aviation noise, such as those recommended by the World Health Organisation and by WHO-Europe<sup>1</sup>.

#### b) Recognise that noise in quiet countryside causes additional disturbance

Noise impacts should not be assessed simply in terms of the number of people affected, but should also recognise both the importance of protecting tranquil areas including Areas of Outstanding Natural Beauty and irreplaceable ancient woodland habitats, and the fact that aircraft can cause additional disturbance in places where background noise levels are low.

#### c) Recognise the impact of flight path changes on quality of life

Recent trials of new, concentrated flight paths, including at Birmingham, Gatwick and Heathrow, have generated significant and unanticipated new disturbance for people, resulting in very strong opposition from those overflown. Yet there is no legal protection from the impact of flight path changes. Proposed flight paths should be consulted on prior to any decision to expand airport capacity, following the principles of the Consultation Charter: Integrity, Visibility, Accessibility, Transparency, Disclosure, Fair Interpretation, and Publication. All evidence of the impacts of flightpath changes should be vigorously appraised.

The Land Compensation Act should be extended to cover properties devalued as a result of flight path changes relating to existing runways.

<sup>1</sup> WHO (1999) *Guidelines for Community Noise* and WHO Europe (2009) *Night Noise Guidelines for Europe*

### 3 Protect public health by upholding and toughening air pollution laws around airports

#### a) Uphold and strengthen air pollution laws

Air pollution is, according to Defra, responsible for 29,000 premature deaths per year in the UK (even if only considering fine particles), and airports can impact air quality both as a result of emissions from aircraft and from associated road traffic accessing the airport, whether freight or passengers. The UK is subject to EU-wide legal limits on pollutants. All principles of the EU Air Quality Directive should be upheld in the context of airport development:

- No breaches of the limits can be permitted
- In areas where legal limits are exceeded, air pollution must not be worsened, but be brought below these limits in the shortest time possible
- Finally, where pollution levels are below the legal threshold, in line with the non-deterioration principle they should not be allowed to worsen

To inform air quality assessments and decisions, regular, rigorous independent monitoring is required, with the results reported publicly.

#### b) Work to WHO recommendations

The UK government should, in the long term, revise legal limits to reflect those recommended by WHO for the protection of human health<sup>1</sup>, allowing for any updates<sup>2</sup> to these guidelines. Air quality around airports should be improved where necessary to ensure compliance with these limits.

<sup>1</sup> WHO (2005) *WHO Air quality guidelines for particulate matter, ozone, nitrogen dioxide and sulphur dioxide*

<sup>2</sup> See for example WHO Europe (2013) Review of evidence on health aspects of air pollution - REVIHAAP project: [http://europa.eu/rapid/press-release\\_IP-13-72\\_en.htm](http://europa.eu/rapid/press-release_IP-13-72_en.htm)

### 4 Examine all local environmental and social impacts of airport expansion, and refuse expansion if the likely impact is unacceptable

#### Airports policy should:

- Avoid harm to protected habitats and species and irreplaceable habitats, and where possible, enhance biodiversity.
- Ensure that inappropriate urbanisation is resisted and countryside protected.
- Protect listed buildings.
- Specify that any changes to Public Safety Zones, and associated planning restrictions for example on future housing development, will be set out in the public domain in advance of any airport expansion decisions.

## 5 Give preference to using existing airport capacity

- Construction of any new airport infrastructure would inevitably have environmental consequences including increased noise, air pollution and road congestion locally, alongside the imposed physical destruction of houses, habitats, listed buildings, and countryside.
- In addition, as a result of UK and international climate commitments, a dramatic increase in carbon prices is anticipated in official forecasts from 2020; a new runway could, if these materialise, easily become a 'stranded asset' and therefore a wasted investment.
- Effective use of existing infrastructure, including regional airports, should therefore be given preference over building new capacity but possibly restricting airports elsewhere in the future<sup>1</sup>.

<sup>1</sup> See Aviation Environment Federation (2014) *The Implications of South East Airport Expansion for Regional Airports*

## 6 Ensure full parliamentary scrutiny and debate

The Airports Commission has terms of reference to produce recommendations to Government on the need for airport expansion and how this can be met. A Parliamentary debate should be carried out in the main Chamber which considers the environmental impacts of implementing the recommendations of the Airports Commission before any decisions are taken.

The debate should therefore be scheduled ahead of:

- the Government's response to the Airports Commission's final report
- the instigation of any work to translate the Commission's recommendations into an aviation NPS or other planning policy.

*This document is supported by the NGOs below which are seeking clarity in party positions on the environmental conditions that should apply to aviation, including airport expansion.*



## FURTHER INFORMATION

If you would like any more information about our proposals for a sustainable aviation strategy, please use the correspondence address below:

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