



## a million voices for nature

### Airports Commission “sifting criteria” – RSPB submission

#### Summary

The RSPB welcomes this opportunity to contribute to the Airports Commission and its process of reflecting on whether and what kind of new airport capacity the UK might need.

In response to the Commission’s request for sifting criteria against which to judge different airport proposals we believe that there are three key criteria which should be used to determine whether any new proposal is necessary and acceptable:

1. *Is new capacity needed?* I.e. is there a sufficient lack of existing capacity and forecast demand to justify the new infrastructure?
2. *Are biodiversity limits respected?* Does the proposal have an unacceptable and irreversible impact on the natural environment?
3. *Are climate change limits respected?* Is the new capacity capable of being built and operated within the UK’s legally binding climate change limits?

#### 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 over 200 reserves throughout the UK.

The RSPB considers that sustainability should be at the heart of decision-making. The RSPB’s policy and advocacy work covers a wide range of issues including planning and regional policy, climate change, energy, transport, and agriculture. As well as commenting on national planning policy issues, the RSPB’s professional conservation and planning specialists make representations on over 1,000 items of planning casework each year throughout the UK, including development plans and individual planning applications and proposals. We thus have considerable planning experience, including on major infrastructure projects such as ports and wind farms. The RSPB also makes over 100 planning applications a year on its own reserves and estate.

Our approach to the aviation sector is underpinned by two principles: that all development should avoid unacceptable harm to wildlife, and that Government and industry should show that any expansion can take place within the legally defined climate change limits of the Climate Change Act.

The RSPB considers that human-induced climate change is the greatest long-term threat to humans and global biodiversity. Up to one third of land-based species on earth could be committed to extinction by 2050 if we do not act to address this problem. Rapid and deep emission cuts in all sectors are essential to avoiding dangerous climate change. An urgent challenge for the UK is therefore to tackle rising carbon emissions from transport and

aviation in particular. The Committee on Climate Change (CCC) says that at least a 60% cut in domestic emissions is needed by 2030 to be on the path to secure a 90% cut (equivalent to at least 80% once emissions from international aviation and shipping are factored in) by 2050.

It is therefore essential to ensure that the aviation sector makes a fair and meaningful contribution towards meeting the UK's overall climate change targets. This will require Government to commit to a sector-specific emissions target at least in line with the pre-existing 2009 target to limit the sector's emissions to 2005 levels by 2050. It will also need robust mechanisms to ensure the sector is on track to meet the target, and a mechanism to review whether these measures are fit for purpose in light of developments in climate change policy and the scientific ability to accurately measure the impacts of aviation's non-CO<sub>2</sub> emissions. Since UK airport capacity, 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 it has demonstrated independently that this growth is possible within the carbon budgets and our longer-term emission target.

Any new capacity must be seen as a last resort and should avoid any damage to protected areas. In the recent past, the RSPB has objected to proposals for airport developments at both Cliffe and Lydd in Kent. The Cliffe proposal would have resulted in the single biggest destruction of a Site of Special Scientific Interest, a Special Protection Area or a Ramsar site ever in the UK. Following the RSPB's 2002 campaign, Government decided not to support the Cliffe option. Since 2007 the RSPB has supplied evidence of the substantial ecological impact an airport at Lydd could have. A final decision is still awaited from the Secretary of State for Transport, following a public inquiry which the RSPB presented evidence to.

### **1. Any proposal must demonstrate genuine and sufficient capacity and demand requirements**

The decision to construct new aviation capacity should be a last resort as new capacity is inevitably the most carbon-intensive, expensive and potentially environmentally damaging of the available responses to projected increases in demand. Other options, including measures to encourage modal shift, to limit the growth in demand for aviation, and to use existing capacity better should therefore always be explored and exhausted before new capacity is built. This is for three principal reasons:

#### *1) Demand projections are misleading*

Forecast demand for aviation has consistently fallen over the past decade. For example, in early 2013 DfT revised their demand forecasts downwards compared to 2011<sup>1</sup>. In the 2003 Air Transport White Paper the Government predicted that there would be between 400 to 600 million passengers per annum by 2030<sup>2</sup>. By 2011 this had been revised downwards to between 300 and 380 million passengers per annum<sup>3</sup>.

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<sup>1</sup> Department for Transport, *UK Aviation Forecasts*, 2013

<sup>2</sup> Department for Transport, *The Future of Air Transport*, 2003

<sup>3</sup> Department for Transport, *UK Aviation Forecast*, 2011

### *2) Environmental limits need to be respected*

'Predict and provide' based on inflated demand projections inevitably conflicts with environmental limits, and, in particular, with the UK's legally binding climate change limits (see section 3 below). The previous Government set a target of keeping aviation's emissions to 2005 levels of 37.5 MtCO<sub>2</sub> by 2050. This means that no more than a 60% rise in demand for aviation (passenger numbers) could be allowed<sup>4</sup>. This cap could even be too generous: current emissions calculations for aviation only account for CO<sub>2</sub> and do not consider other emissions. While there is no agreed scientific methodology for measuring the effect of these non-CO<sub>2</sub> emissions, some estimate that they could double the global warming impact of aviation. In this scenario of no more than a 60% rise in demand, research by the Airport Environment Foundation for WWF has shown that there is enough capacity, even in the South East, up to 2030<sup>5</sup>. Beyond 2030, a small shortfall in terminal capacity exists and there is a surplus in runway capacity. In the South East there is a small shortfall in both terminal and runway capacity, but it is not large enough to justify significant expansion.

### *3) Alternatives to capacity expansion exist*

The Committee on Climate Change has suggested that there are a number of options available to limit the increase in demand for aviation in order to help the sector remain within climate change limits<sup>6</sup>. These, include an additional tax on carbon from aviation and the restriction of allocation of landing permits and take-off slots. WWF's One in Five Challenge has successfully demonstrated that businesses can reduce their requirements for business flights by over 20% when they use alternatives to travel such as videoconferencing<sup>7</sup>. Additionally, modal shift from aviation to other forms of lower carbon transport including high-speed rail and should be the priority for Government and private sector investment and policy. These alternatives to aviation could help to limit demand in the medium term and reduce any (perceived) need for new airport capacity.

## **2. Any new development should avoid unacceptable and irreversible environmental destruction**

Many of the existing proposals for new airport capacity centre on the Thames Estuary. These developments would pose a severe threat to the wildlife of the Estuary, which is home to over 300,000 wintering birds and a range of other wildlife. Many sites across the area are also designated under the highest level of protection.

Any proposal for new capacity should avoid such sites where they would have an unacceptable and irreversible damage. We are confident that this would be the outcome of

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<sup>4</sup> Committee on Climate Change, *Meeting the UK aviation target – options for reducing emissions to 2050*, 2009

<sup>5</sup> WWF/AEF, *Available UK airport capacity under a 2050 CO<sub>2</sub> target for the aviation sector*, 2011

<sup>6</sup> Committee on Climate Change, *Meeting the UK aviation target – options for reducing emissions to 2050*, 2009

<sup>7</sup> WWF, *One in Five Challenge Annual Report 2009/10*

any proposed development in such areas because legal framework for site protection requires that there must be a case of overriding public importance, that no feasible alternatives are available, and that adequate compensatory habitat can be provided elsewhere. Indeed, we have seen no convincing evidence that all of these conditions can be met by the Thames Estuary airport proposals. However, we are keen to avoid drawn out conflicts over specific sites in advance by ensuring aviation policy sifts proposals appropriately.

### **3. Any proposal must be able to clearly show how it will operate within the UK's binding climate change targets**

Aviation is the fastest growing source of emissions in the UK and by 2050 could represent over 25% of all UK greenhouse gas emissions. Any new airport proposal must show that it can be built and operate (within the lifetime of the infrastructure) without resulting in spiraling demand and flights which threaten to breach the UK's legally binding climate change limits of reducing economy-wide emissions by 80% by 2050. Aviation must reduce its emissions in line with other sectors of the economy and can no longer continue to represent a special exemption from these efforts.

International aviation emissions are not currently counted in the UK's five-yearly carbon budgets. In December 2012 the Government postponed a decision on whether to formally include them, but did endorse the standing practice by the Committee on Climate Change of designing the budgets for the rest of the economy as if these emissions had been included. A decision on the formal inclusion of these emissions will be made in 2016 and we expect these emissions to be incorporated. Failure to formally include them would amount to a watering down of the UK's commitments under the Climate Change Act, according to the Committee on Climate Change<sup>8</sup>. Therefore, it is imperative that measures be taken to limit the growth in demand for aviation. Construction of a new airport or new runways would seem to undermine attempts to limit the rise in emissions.

While many claim that improved aircraft efficiency and biofuels can provide emissions savings, we are cautious about the contribution made by these means. The Committee on Climate Change estimate that biofuels could provide at most 10% of aviation fuel and that we could expect a 0.8% annual improvement in aircraft efficiency. Such improvements and savings are valuable, but they must not be lost by increases in the level of flying.

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<sup>8</sup> David Kennedy, Committee on Climate Change, Corrected Transcript of Oral Evidence on Inclusion of International Aviation and Shipping Emissions in Carbon Budgets, Tuesday 16 October 2012