



plane stupid

F.A.O. Newham Council Development Control Committee

October 8th 2008

Regarding: the application to expand City Airport, raising the number of flights to 120,000 per annum

We are writing to urge the Development Control Committee to reject the application, on the following grounds.

1. Climate Change and Aviation Policy in the UK

The policy support for a UK-wide programme of airport capacity expansion set out in the 2003 Air Transport White Paper is now widely recognised as being fundamentally at odds with the oft-stated need to address dangerous climate change. This problem is clearly not unique to City Airport, but is nonetheless very relevant to planning decisions around the airport's present expansion plans.

Defra's Committee on Climate Change (CCC) yesterday gave an indication of what it will say in its review of the current 2050 emissions target, due to be published before the end of 2008¹. Climate science has moved on a long way since the Climate Bill was first drafted, and the CCC recommend that the planned cut in UK emissions be raised from 60% to *at least* 80%. But the DfT's own projections indicate that aviation could account for 70% of the UK's total carbon budget by 2050 in this scenario². Studies by scientists at the Tyndall Centre using more realistic input data indicate that if the proposed nationwide doubling of air traffic takes place, aviation could in fact account for the UK's entire allowable national carbon budget by some time in the mid 2030s³.

The government's independent watchdog on sustainable development, the SDC, is arguing vigorously for an independent review of UK aviation policy in light of recent events such as the Stern Review and advances in our understanding of climate systems, and of the 'conflicting arguments and incomplete data'⁴ supporting the case for expansion. The government's ex-chief scientific adviser, Professor Sir David King, has also come out strongly against further airport expansion, saying of the present aviation policy:

*'In effect, Labour ministers have been working in opposition to what is necessary for the public good, while eschewing obvious levers available to them to reduce the demand for fossil fuels.'*⁵

So far this government has sought to evade the obvious implications of this policy contradiction by refusing to account for emissions from international aviation in its climate change strategy, citing confusion over how to allocate these emissions nationally. The untenable nature of this fudge is explicitly noted

by the CCC in Lord Turner's letter to the government this week; 'The principle here is clear: any climate change strategy should cover all GHGs and all sectors.' Whilst the CCC stop short of insisting that international aviation emissions are made part of the legally binding annual carbon budgets, acknowledging the genuine practical difficulties this would entail, they nevertheless expressly recognise that the present situation in which these emissions remain entirely unaccounted for cannot continue:

'...budgets and targets should be higher to the extent that international aviation and shipping emissions do not fall sufficiently. For this reason, we recommend that the 80% GHG should be regarded as a minimum target for those sectors covered by the Bill, with further reductions required if international aviation and shipping emissions are not on track to deliver an 80% reduction in 2050.'

This is in itself disingenuous, as in the absence of demand restraint policies there is no reason to expect that aviation emissions will not continue to rise. This virtually guarantees that the already extremely challenging cuts demanded of every other sector of our economy be made even more painful and precipitous – and very likely physically impossible.

This government has sought, alongside many airlines and other European countries, to deflect these concerns by pressing for aviation's inclusion in the European Emissions Trading Scheme (ETS). This policy measure is expressly intended to facilitate dramatic growth in air transport and its attendant emissions through enabling airlines to purchase emissions credits from other sectors that have successfully reduced their own emissions. Its overall effect on air transport emissions across the entire EU up until 2020 will be to facilitate a projected growth in these emissions of 83% - as opposed to 86% if the ETS had not been introduced⁶. Contrary to the impression routinely given by Ministers, the EU ETS will demonstrably fail to adequately address the problem of rising aviation emissions, and the CCC 'do not believe that the EU ETS methodology is an appropriate basis for inclusion of international aviation in UK budgets.' - the implication being that some additional policy measure is necessary for this.

Planned improvements in aircraft fuel efficiency and rationalisation of air traffic management across the EU are contributing to a marginal year-on-year reduction in carbon intensity in this sector; yet even the industry itself admits that its overall emissions continue to rise by around 3% each year⁷. There is no credible expectation that alternative, sustainable fuels will become commercially available any time soon, or that step-changes in engine or wing design will significantly alter the fleet mix using our airports; indeed, The Royal Commission on Environmental Pollution concluded, 'that the projected increase in demand will easily outstrip any such technological developments for several decades.'⁸

The central government policy enthusiasm for wholesale expansion of airport capacity that has guided this application is dangerously outmoded, and will not stand the test of time. Sooner or later it cannot avoid coming up against our national commitment to reduce greenhouse gas emissions to avoid dangerous climate change. This policy contradiction is already obvious, but as time goes on

it will become embarrassingly isolated; aviation and shipping are the only remaining high carbon sectors to lack policy measures aimed at reducing their emissions. As work gets underway to bring about the huge cuts needed in emissions from domestic energy use, heavy industry, public sector buildings, construction, surface transport etc, it will become more and more clear that aviation emissions cannot be allowed to continue to rise steeply without jeopardising the entire enterprise. Air travel is currently getting a free ride in terms of both national and international environmental and taxation policy. But in the long term, this sector is inherently unsustainable due its extremely carbon intensive nature, a fact that cannot be ignored forever by policy makers.

2. Climate Change, City Airport and Newham Council

Since May, 2007, Newham Council has been a signatory of the Nottingham Declaration. As such, the Council recognises that ‘climate change through human activity is taking place and that Newham has a role in addressing both its causes and effects’⁹. The Council thereby recognises within its 2008 Sustainable Community Strategy that, ‘To demonstrate its commitment, the council is already taking action to do what it can to reduce greenhouse gas emissions across its own extensive activities’¹⁰. Expanding City Airport would therefore directly contravene the Council’s own environmental commitments. Furthermore, it would set an unsustainable precedent for those living within the borough.

An expansion of capacity at City Airport would set Newham Council in direct opposition with the environmental targets and goals it has set. Newham’s Community Plan outlines the Council’s commitment to ‘increas[ing] environmental awareness among local people’¹¹ and states that ‘People must be more aware of their own responsibilities for our environment at a local level’¹². Such goals will be impossible to achieve if the Council fails to take tough and assertive action on climate change.

3. Unsupported economic assumptions underpinning UK Aviation Policy

The assumptions underlying the economic models used to support the present expansionist policy have already proven to be extremely wide of the mark with regards to oil price. It is foolhardy in the extreme to base crucial long term decisions about transport infrastructure on the wildly fictitious projections of oil prices found in the 2003 White Paper. Investment in unsustainable job creation will not benefit the residents or the economy of Newham, except in the very short term.

Conclusion

In summary, it is abundantly clear that any decision to allow the number of flights using City airport to rise by up to 50% will be looked back on as short-sighted and irresponsible by those who will have to live with its consequences. We urge the committee in the strongest possible terms to recognise and acknowledge where the public interest lies in this matter, and reject the application.

Leo Murray and Elizabeth Baines, on behalf of Plane Stupid

¹ See Appendix 1, 'Interim advice by the Committee on Climate Change', Lord Turner of Echinswell 07/10/08.

² See Appendix 2, 'Contested Evidence: the case for an independent review of aviation policy', *Sustainable Development Commission*, 16/09/08.

³ Anderson, K. & Bows, A. (2006) 'Policy Clash: Can projected aviation growth be reconciled with the UK Government's 60% carbon-reduction target?', *Transport Policy*.

⁴ Ibid.

⁵ 'Big business shows politicians how the planet can be saved', Professor Sir David King, *The Observer*, 13/07/2008.

⁶ 'Including Aviation in the EU's Emissions Trading Scheme', *European Federation for Transport and the Environment*, 06/08.

⁷ 'Building a greener future', *The International Air Transport Association (IATA)* 04/08.

⁸ 'The Environmental Effects of Civil Aircraft in Flight', *The Royal Commission on Environmental Pollution*, 29/11/02

⁹ Newham Sustainable Community Strategy, 01/08:

<http://www.newham.gov.uk/Services/CorporatePlans/NewhamSustainableCommunityStrategy-2008.htm>

¹⁰ Newham Sustainable Community Strategy, 01/08:

<http://www.newham.gov.uk/Services/CorporatePlans/NewhamSustainableCommunityStrategy-2008.htm>

¹¹ Newham Community Strategy:

<http://apps.newham.gov.uk/democracy/LSPPages/Communitystrategy.pdf>

¹² Newham Community Strategy:

<http://apps.newham.gov.uk/democracy/LSPPages/Communitystrategy.pdf>