

Town and Country Planning Act 1990

Applications by London Ashford Airport Ltd

APP/L2250/V/10/2131934 & APP/L2250/V/10/2131936

Site at London Ashford Airport Limited, Lydd, Romney Marsh, TN29 9QL

CPRE/06/B – Greenhouse gas (GHG) emissions from additional flights, airport operation, traffic generation and ancillary activities

SUMMARY

Statement by Sean Furey BSc (Hons) MSc C.WEM MCIWEM FRGS
on behalf of Protect Kent (the Kent Branch of CPRE) on Greenhouse gas (GHG) emissions from additional flights, airport operation, traffic generation and ancillary activities

- 1.1 Protect Kent is the Kent Branch of the Campaign to Protect Rural England (CPRE). CPRE is a national charity which promotes the beauty, tranquillity and diversity of rural England. We advocate positive solutions for the long-term future of the countryside, as well as challenging proposals that will harm it. Founded in 1926, we have around 60,000 supporters and a branch in every county. The Kent Branch was established in 1929.
- 1.2 My name is Sean Furey and I am employed as the Deputy Director of the Kent Branch of the Campaign to Protect Rural England (CPRE Protect Kent). I hold a degree in Environmental Sciences from the University of East Anglia (specialising in climate and atmospheric sciences) and a Master's Degree in Infrastructure Engineering from Cranfield University. I am a Chartered Water and Environment Manager and Fellow of the Royal Geographical Society. I am responsible for campaigns on climate change and water management and co-ordinate the Kent Climate Change Forum, which comprises a number of national and local bodies including Kent Wildlife Trust, RSPB, Hadlow College, National Farmers' Union, Canterbury Christ Church University, Defend Our Coast and others non-governmental bodies who work in Kent. I was previously employed by the Environment Agency in Kent in various roles between 1999 and 2007 as a hydrologist, Assistant Flood Warning Duty Officer, Project Manager for Integrated Water Management and a Sustainable Development Officer dealing with carbon foot-printing issues. I presented evidence on carbon emissions to the public inquiry into the Kent International Gateway in 2009.
- 1.3 Climate change, or climate destabilisation, is potentially one of the most serious threats to our economy and society and there is general scientific consensus that human activity is a major factor in this change, and in particular the emissions to the atmosphere from burning fossil fuels – coal, oil and gas. Aviation is of particular concern because of its rapid growth and because aircraft emit carbon dioxide, and other gases, high in the atmosphere

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where they have a greater effect on the Earth's heat budget.

- 1.4 There is a lack of specific regulation regarding the Carbon Dioxide Equivalent (CO₂e) emissions associated with the aviation sector and much of current policy draws on the out-dated Aviation White Paper of 2003. However, there are a number of Government targets and policies, to which the aviation sector contributes and hence it is a material consideration for this inquiry.
- 1.5 Aviation has seen huge growth over the last few decades, especially with the boom in budget airlines. The true cost of aviation is not adequately expressed in the price paid by the traveller, nor is any element of the price paid used to mitigate the damage caused. This is because many of the costs to society are externalised (climate impact, noise etc.) and the UK aviation industry is subsidised, relative to car travel, to the order of £9 billion a year. Britain's CO₂ emissions from aircraft approximately doubled between 1990 and 2000, and are projected by the government to double again by 2030.
- 1.6 Aviation's impact on the climate is worsened by the fact that the polluting emissions happen largely high up in the atmosphere. Here they can do more damage, with not only CO₂ but also water vapour and nitrogen oxides having an effect.
- 1.7 The aviation industry often quote that they are responsible for 'only' 2% of global GHG emissions, however recent studies have shown that the total climate change impact is closer to 4.9% of human activity, and growing rapidly. In the UK, the Government estimated that aviation represented 6.3% of UK carbon emissions in 2005.
- 1.8 If there were no runway capacity constraints and no carbon price, the Committee for Climate Change (CCC) project that demand would grow by over 200% by 2050 relative to 2005 levels (i.e. from 230 million passengers to 695 million passengers annually). In addition, even if aviation met its target of achieving 2005 CO₂ emission levels by 2050, the rest of the economy would have to make 90% cuts in CO₂ emissions.
- 1.9 In his ruling, Lord Justice Carnwath makes the following observations of the policy situation in regard to the White Paper *The Future of Air Transport* ("ATWP") that show that carbon emissions are a material consideration.
- 1.10 Our concern about being locked into high-carbon infrastructure forms the basis of our objection on this topic. While the emissions are primarily from the aircraft using the airport, rather than the airport itself, in a recent report the Tyndall Centre concludes that: "*Growth in regional airports and expansion of existing airports results in a 'ratchet' on the growth in aviation emissions.*"
- 1.11 In August 2008, the applicants responded to a council request for further information within a minimal statement of intent to manage their carbon emissions at the airport.
- 1.12 No quantitative assessment has been done of the greenhouse gas emissions associated with this application, nor has a quantitative evaluation of the mitigation measures been done.
- 1.13 We believe that the applicants should have responded to request with a quantitative assessment, in a similar manner to the applicants at the recent inquiry into the expansion

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of Farnborough Aerodrome and in the recent planning application for the expansion of Bristol Airport. The justification in the context of this inquiry is that current operations are currently at a low level which they anticipate increasing to 500,000 passengers per year. This represents a substantial increase in GHG emissions, which is a material planning consideration.

1.14 In their Environmental Statement, the applicants argue that:

“greenhouse gas emissions estimates at 500,000 are difficult at this stage, as it is not clear which routes and exact fleet mixes will be commercially sustainable.”

1.15 It seems implausible that the applicants can put forward a credible economic case for their proposals if they are unable identify what market they will serve. While it is fair to state an exact value cannot be given, it can certainly be estimated and the necessary data will be part of the LAA business model i.e. the proportion of domestic, and international short-haul, long-haul, cargo and general aircraft. Depending on the runway length an upper limit on range for a given aircraft can be stated, and by looking at comparable airports it should be possible estimate route and plane mix. Indeed, in the Statement of Common Ground with Shepway District Council does provide a projection for the aircraft mix.

1.16 In my proof I use the little information that is available on likely destinations to demonstrate that in most cases, Kent and East Sussex is already well served by air services from Manston, Gatwick, Heathrow, Stansted and Luton; ferry services from Dover, Channel Tunnel and Eurostar services from Ashford and Cheriton.

1.17 An indicative scenario is used illustrate that flying from LAA to a typical destination would have far higher total greenhouse gas emissions than existing alternatives.

2 CONCLUSION

2.1 Climate change policy was radically updated by the 2008 Climate Change Act. Its key provisions were to put in place the Committee for Climate Change (CCC) and to put overriding legal requirements on government to cap climate change emissions by 2019 and 2050. The Government set the target of getting aviation emissions at or below 2005 levels by 2050. This means that GHG emissions associated with the expansion of Lydd Airport are a material planning consideration of significant weight.

2.2 The information provided by the applicants on their baseline GHG emissions, the effectiveness of their proposed mitigation measures and the residual emissions is inadequate for the purpose of making a decision on this key planning criteria because there has been no quantitative assessment done whatsoever. We would expect some estimate of the magnitude of the various emissions components i.e. surface access, terminal, and flights. However experience from elsewhere means that it would be likely to show that no matter how insulated the airport building are and that no matter how much car travel it saves (by being a nearer airport for some travellers) that this also does not compensate for the flights.