

NPS Consultation Response: **Thematic Paper**

Climate Change

May 2017

Key Points:

- The NPS is unclear on what a third runway means for UK carbon targets.
- The NPS appears to ignore the advice of the Committee on Climate Change that it should exclude the use of carbon credits. This could have serious implication for growth at other UK airports and other UK industry sectors.

1. Context

- 1.1 The UK's obligations on greenhouse gas emissions are determined under the 2008 Climate Change Act. Under this framework, the UK has a 2050 target to reduce its greenhouse gas emissions by at least 80% on 1990 levels, and has a series of five year carbon budgets up to 2050.
- 1.2 Domestic aviation emissions are included in this 2050 target but international aviation emissions are not. The Climate Change Act says that the Government must "take into account" the "estimated amount of reportable emissions from international aviation for the budgetary period or periods in question" when setting carbon budgets.
- 1.3 The Committee on Climate Change has interpreted this requirement to mean that the UK should take international aviation emissions into account when aiming to meet the 2050 target and has made its recommendations for the levels of the existing carbon budgets on this basis.
- 1.4 The Mayor is taking action to ensure London can make its contribution to reducing greenhouse gas emissions in this context. Aviation contributes around 2.5 per cent of London's greenhouse gas emissions¹.
- 1.5 The NPS states that "the carbon impact of the proposed development falls into four areas: increased emissions from air transport movements (both international and domestic) as a result of increased demand, emissions from airport buildings and ground operations, emissions from surface transport accessing the expanded airport, and emissions caused by construction. The first is the largest of these impacts²."

¹ London Energy and Greenhouse Gas Emissions Inventory

² Draft NPS – section 5.73

2. Meeting the carbon target

- 2.1 The NPS repeats the work and conclusions of the Airports Commission (AC). The AC developed two carbon policy scenarios; carbon-capped and carbon-traded, and used both to assess the carbon impacts of expansion. The AC concluded that a third runway at Heathrow (and any of the shortlisted schemes) could be delivered within the UK's climate change commitments.
- 2.2 In the Specific Impacts and Requirements chapter of the NPS, it is a requirement that HAL "provide evidence of the carbon impact of the project (including embodied carbon), both from construction and operation"³.
- 2.3 The NPS and the AC, however, treat Heathrow in isolation simply stating that it meets the obligation. The NPS does not comment on the how the scheme fits into the national climate change picture.
- 2.4 The Chairman of the Committee on Climate Change (CCC) wrote to the Secretary of State in November 2016⁴ raising his concerns about its treatment of greenhouse gas emissions for Heathrow expansion. The CCC reiterated its planning assumption that UK aviation emissions should be reduced to 2005 levels by 2050⁵ and that this should be achieved without the use of carbon credits.
- 2.5 Moreover, the CCC emphasised its concern that if carbon credits are relied on, it could limit growth at other UK airports and require deeper cuts in the emissions by other sectors. Both of these will be challenging and could undermine growth – yet the issue is not addressed by the NPS.
- 2.6 The Statement of Requirements states that Heathrow must "seek to quantify the impacts" of surface access emissions from the airport, construction, staff and freight⁶.
- 2.7 However the NPS's supporting documents, and the AC's work, did not assess the carbon impact of surface access emissions from staff or freight trips⁷. This is despite a third runway generating up to 77,000 additional jobs by 2030 and freight capacity doubling^{8,9}.
- 2.8 Therefore the NPS's assertion that the third runway can be delivered within Climate Change obligations is based on an incomplete evidence base.

³ Draft NPS – section 5.75

⁴ Letter from Chairman of Committee on Climate Change to Secretary of State, 22 November 2016

⁵ Aviation emissions should be at the same level in 2050 as they were in 2005 without the use of international credits in order to meet the 2050 target set out by the 2008 Climate Change Act

⁶ Draft NPS – section 5.76

⁷ Draft NPS, Appraisal of Sustainability, Appendix 9 – Carbon, section 9.11.4

⁸ Draft NPS – section 3.27

⁹ Draft NPS – section 3.70