



## **Greenpeace response to the Department for Transport's consultation "Adding capacity at Heathrow Airport"**

**February 2008**

### **Summary**

Greenpeace believes that if the Government is serious about tackling climate change, there should be no question of increasing the number of flights coming in and out of Heathrow Airport. Instead the Government should be radically rethinking its out-of-date policy on aviation, implementing strategies to cap the number of flights at current levels with a view to *reducing them* in the future and move towards a sustainable, low-carbon transport system.

Greenpeace also considers this consultation process to be seriously flawed: designed to push through a decision that has already been made and without properly taking into account the effect on the environment, or seriously considering alternatives.

However, Greenpeace takes this opportunity to set out its primary concerns below, as though the Government were genuinely seeking views on airport expansion.

### **1. Greenpeace**

1.1 Greenpeace UK is the autonomous regional office of Greenpeace, one of the world's leading environmental campaigning organizations. Greenpeace has regional offices in 40 countries, 2.8 million supporters worldwide and around 150,000 in the UK. It is independent of governments and businesses, being funded entirely by individual subscriptions.

1.2 Greenpeace was one of the first organisations to campaign for action to be taken to halt anthropogenic climate change. It has built up considerable expertise and has access to independent expertise on the links between aviation and climate change.

1.3 Greenpeace's expertise and status on climate change is recognised in a number of international and national fora. At international level, Greenpeace holds Economic and Social Council NGO status at the United Nations.

Greenpeace has participated in and observed the UN's Climate Change Negotiations since 1989. Among Greenpeace staff members are lead authors on reports of the many chapters for the Intergovernmental Panel on Climate Change. Greenpeace has participated in and observed at the Convention on Bio-Diversity, including contributing to consideration of the impacts of climate change on bio-diversity, participated and observed at the Earth Summit in 1992, the 2002 World Summit on Sustainable development and the UN World Conference on Renewables. Greenpeace also has official observer status and engages in public consultations held by the World Bank, the International Energy Agency, the IMF and the Asian Development Bank.

## **2. Concerns about the consultation process**

2.1 Greenpeace has serious concerns about the way that the consultation has been conducted. It believes that the 2003 policy on which the consultation is based should be revisited, for political and legal reasons as well as on clear environmental and scientific grounds. Alternatives to airport expansion, such as improved train links, should be properly considered.

2.2 The consultation document states that the 2003 Aviation transport White Paper (ATWP) means that Government will support the proposed plans to increase capacity at Heathrow by introducing mixed-mode and building a third runway if three criteria are met: a limit on noise; a limit on air quality; and an improvement in public transport access.

2.3 Even if, which Greenpeace does not accept it should be, the 2003 ATWP is taken as a starting point, it does not justify the Government's pre-emptive support for mixed-mode. In the judgment *ex-parte Wandsworth*,<sup>1</sup> it was said that:

"140. Because he accepted that a change from segregated to mixed mode in the short term would be significant change to the landscape about which there had not been consultation, the Defendant accepted that there would need to be another round of "public consultation".... that is precisely what must happen in respect of any proposal to change from segregated to mixed mode operation."

2.4 It is clear that mixed mode should be subjected to full public consultation *before* the Government decides whether or not to support it and the support expressed in the consultation document is therefore premature and unlawful.

2.5 However, it seems clear that the Government's mind is already made up. For example, on 26<sup>th</sup> November 2007 the Prime Minister, Gordon Brown, said to a CBI conference that the Government would press ahead with the expansion of Heathrow airport saying there was a

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<sup>1</sup> London Borough of Wandsworth and others v Secretary of State for Transport [2005] EWHC Admin.

"clear business imperative" for increased capacity. "Our prosperity depends on it," he told delegates. This statement and others like it have undermined the consultation process and the legitimacy of any decision which follows it.

2.6 Legitimacy of and confidence in the process has been further undermined by the extent to which the Government has worked with BAA to produce the facts and figures upon which a decision will be made. By contrast, consultees have been given very little time and not enough information to properly criticize the facts and figures.<sup>2</sup> As set out below the Environmental Impact Assessment is inadequate.

### **3. The 2003 Aviation White Paper should be re-visited.**

3.1 As the Government has acknowledged in other contexts, the world has changed since 2003.<sup>3</sup> Climate change is happening much more rapidly than anticipated.

3.2 It is now widely accepted that we will need to cut carbon dioxide emissions by at least 80% by 2050 if we are to avert catastrophic climate change

3.3 A policy formed in 2003 in favour of activity which will *add* to Co2 emissions and *increase* contribution to climate change should not be adopted in 2008 without proper re-assessment, full open and transparent public consultation and proper re-consideration, informed by the facts that we now know. These include:

- The Government's own target of cutting UK Co2 emissions by 60% by 2050.
- Scientific consensus that even this is not enough to stop temperatures rising by more than 2 degrees and that a more stringent target will be needed in the near future<sup>4</sup>.
- Recognition that action is needed now in order to avert dangerous climate change<sup>5</sup>.

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<sup>2</sup> Through the Freedom of Information Act Justine Greening MP obtained documents which show that there has been extraordinary collusion between the Government (the Department for Transport) and the British Airports Authority (BAA), working together to influence the outcome of the consultation<sup>2</sup>. BAA and the government have set up a joint body - the Heathrow Delivery Group - aimed at steering the plans through the consultation process. BAA officials have written parts of the consultation. BAA supplied the data for calculations of noise and pollution that inform the premise of the consultation document, which opposition groups have not been permitted to challenge. The DfT and BAA have drawn up a 'risk list' - a list of threats to the building of the 3rd runway. The list includes the 2M campaign, the group comprising councils representing 2 million people opposed to the plans.

<sup>3</sup> Malcolm Wicks, Government Energy Minister, October 2006. See

<http://www.berr.gov.uk/about/ministerial-team/page34857.html>

<sup>4</sup> See Höhne N, Phylipsen D, Moltmann S (2007): Factors underpinning future action - 2007 update, report for the Department for Environment Food and Rural Affairs (DEFRA), United Kingdom, prepared by Ecofys <http://www.fiacc.net/data/fufa2.pdf>

- Nicholas Stern concluded that failing to act now, or even delay of 10 to 20 years, could cause economically overwhelming damage<sup>6</sup>.
- The recent 4th Assessment Report from the Intergovernmental Panel on Climate Change (IPCC)<sup>7</sup> presented the firmest evidence yet that the economies of the developed world must be decarbonised within a rapid timescale.

### 3.4 Policy considerations in relation to climate change and aviation should include the following facts:

- The UK population has the highest emissions from aviation per head in the world.
- It is estimated that in 2000, aviation made up between 4% and 9% of the global climate change impact<sup>8</sup>.
- Flights from and within the UK account for 13% of the UK's climate impact because greenhouse gases create more global warming when emitted at altitude<sup>9</sup>.
- Between 1990 and 2000 emissions from aviation doubled.<sup>10</sup>
- Research by The Tyndall Centre for Climate Change Research suggests that if we aim to cut carbon emissions by 80%, as even Gordon Brown has hinted we might, then aviation would take up all the 32MtC allowance, meaning all other sectors would have to emit zero<sup>11</sup>.
- Small increases in the efficiency of planes will be overwhelmed by an unrestrained growth in flights. Small cuts in emissions as result of efficiency improvements would only be made if flights were capped at current or reduced levels.<sup>12</sup>

### 3.5 The Government is wrong to present the debate as one of economic gain versus environmental damage. The Environmental Institute of the

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<sup>5</sup> Avoiding Dangerous Climate Change, International Symposium on the Stabilisation of greenhouse gas Concentrations, Hadley Centre, Met Office, Exeter, UK, 1-3 February 2005. Report of the International Scientific Steering Committee, May 2005, page 7.

<sup>6</sup> Stern Review Report on the Economics of Climate Change, October 2006

<sup>7</sup> Intergovernmental Panel on Climate Change (IPCC) (2007), Fourth Assessment Report: Climate Change 2007: Synthesis Report - Summary for Policymakers  
[http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4\\_syr\\_spm.pdf](http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr_spm.pdf)

<sup>8</sup> T&E background briefing (2007) *Including Aviation in the EU's Emissions Trading Scheme (EU ETS)* page 2.

<sup>9</sup> Gillian Merron Answer to parliamentary question 26<sup>th</sup> April 2007.

<sup>10</sup> Cairns, S, Newson, C, (2006) *Predict and Decide, Aviation, climate change and UK policy*. Page 13

<sup>11</sup> Bows A., Anderson K., Upham P. (2006) *Contraction & Convergence: UK carbon emissions and the implications for UK air traffic*: Tyndall Centre Technical Report 40. Also: Bows A., Anderson K., Upham P. (2006) *Growth scenarios for EU and UK aviation: contradictions with climate policy*. Tyndall Centre for Climate Change Research. University of Manchester. 2006

<sup>12</sup> Government estimates that there could be a 50% improvement in efficiency between 2000 2050. This is thought by other independent researchers to be over optimistic. Owen and Lee put the figure at 15 percent between 2005 and 2050 and the Tyndall Centre for Climate Change Research predicts 43% for 2002 to 2050. The 2002 special report on aviation by the Royal Commission on Environmental Pollution concluded that all industry forecasts of technological improvements were not necessarily realistic in the timescales envisaged, concluding: "the ambitious targets for technological improvement in some industry announcements are clearly aspirations rather than projections". There will however be some level of improved efficiency but these gains are dwarfed by the projected increase in passenger miles with conservative estimations predicting a doubling of emissions by 2050 despite improvements in efficiency.

University of Oxford, for example, highlights that the argument of the aviation white paper - that supporting aviation is, overall, beneficial to the economy - appears to have been made on the basis of a relatively narrow cost-benefit analysis, and to have overlooked or downplayed a number of factors which might lead to the opposite conclusion<sup>13</sup>.

- 3.6 An independent study by CE Delft, released in February, criticized the methodology of the Oxford Economic Forecasting (OEF) reports of 1999 and 2006 on which the Government bases its economic case for building a third runway. Their study suggests that the economic benefits were exaggerated by the OEF.<sup>14</sup>

#### Support for Policy Change

- 3.7 The House of Lords EU Sub-Committee on Environment and Agriculture has said "It is extraordinary that on the one hand the Government is concerned with climate change and on the other it's encouraging a rapid increase in air travel."<sup>15</sup>
- 3.8 In 2006, the House of Commons Environmental Audit Committee said: "Under the DfT's "best case" projections, then, aviation will grow from around 5% of the UK's carbon emissions today to 24% in 2050 (in neither case counting radiative forcing, which would increase these proportions). In other words, even in the Government's own and most optimistic projections, every other sector of the economy would have to cut its share of UK emissions, while that of aviation would be assisted to almost quintuple. Given that these are both "best case" figures and do not take into account radiative forcing, this is likely to be a very substantial understatement of the actual figure to which the Government's current expansion policies are leading."<sup>16</sup>
- 3.9 With regard to the EU Emissions Trading Scheme (EU ETS), the House of Commons Environmental Audit Committee said in 2007:  
"While we support the principle of including aviation in the EU ETS, this will only be effective if the terms of its inclusion are such to constrain and ultimately reverse the rise in aviation emissions. However, we have severe doubts as to its effectiveness under current proposals."<sup>17</sup>

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<sup>13</sup> Cairns, S. Newson, C. Predict and decide: aviation, climate change and UK policy, Environmental Change Institute of the University of Oxford. September 2006 Chapter 5.

<sup>14</sup> Boon, Davidson, Faber, Nelissen, Vreede. The Economics of Heathrow Expansion, Final Report. CE Delft. Commissioned by HACAN. February 2008  
<http://www.hacan.org.uk/resources/reports/4504.final.report.pdf>

<sup>15</sup> Lord Renton of Mount Harry, Chair House of Lords EU-Sub Committee on Environment and Agriculture, 10 November 2004

<sup>16</sup> Environmental Audit Committee, Reducing Carbon Emissions from Transport, Ninth Report of Session 2005-06 HC 981-1, 7 August 2006 p61

<sup>17</sup> Environmental Audit Committee, *The EU Emissions Trading Scheme: Lessons for the Future*, Session 2006-07, 20 February 2007

3.9 A recent House of Commons Research paper stated: "Given the predicted growth in the aviation sector, it seems likely that unless emissions are curbed, they will cancel out efforts made to reduce emissions in other sectors."<sup>18</sup>

3.10 It also stated "Although all airport expansion will have an impact on climate change, it is the proposals for new runways which will potentially give rise to the biggest increase in emissions as they will allow for more aircraft to land and take-off".<sup>19</sup>

3.11 For all these reasons, Government policy in favour of airport expansion as set out in the ATWP should be revisited and changed.

#### **4. Why Heathrow's expansion is unnecessary**

4.1. Of Heathrow's 470,000 flights 100,000 are to destinations within 500 km of an airport where there is already a good rail alternative.<sup>20</sup> Trains are up to 10 times more efficient<sup>21</sup>. Removing these short haul flights from Heathrow would have little impact on people's mobility and would negate any need for the airport's expansion.

4.2 Demand is not for business flights, as the government implies. Most of the current passenger demand for air travel is for leisure purposes, and the majority of growth has come from UK residents making increasing numbers of leisure trips abroad on no-frills carriers. Future forecasts presume that UK leisure passengers will still constitute the largest share of air passengers.<sup>22</sup>

#### **5. Strategic Environmental Assessment and Environmental Impact Assessment**

5.1 Before there is any question of adopting the policy in the ATWP it should first be subject to a Strategic Environmental Assessment, including full public consultation and parliamentary scrutiny, in accordance with European Directive 2001/42/EC.

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<sup>18</sup> Aviation and Climate Change, House of Commons Research Paper, Jan 2008. (Title page)  
<http://www.parliament.uk/commons/lib/research/rp2008/rp08-008.pdf>

<sup>19</sup> Ibid. Page 15.

<sup>20</sup> Short-Haul Flights: clogging up Heathrow's Runways, HACAN, November 2006

<http://www.hacan.org.uk/resources/reports/short.haul.flights.clogging.up.heathrows.runways.pdf>

<sup>21</sup> DfT estimate that short haul air craft emit 0.15 kg/CO<sub>2</sub> per passenger Km. This multiplied by 2.7 (the IPCC's best estimate for the impact of radiative forcing) equals 0.405. DfT estimates rail on average emits 0.04 kg/CO<sub>2</sub> per passenger Km, approximately 10% of 0.405.

<sup>22</sup> Cairns, S. Newson, C. Predict and decide: aviation, climate change and UK policy, Environmental Change Institute of the University of Oxford. September 2006

5.2 The purpose of the SEA Directive is to ensure that all plans and programmes which are prepared for sectors and which set a framework for future development consent of projects listed in the Annexes to the EIA Directive and which are therefore likely to have significant environmental effects, are made subject to systematic environmental assessment: see recital (10) to the SEA Directive and Article 3. The purpose of the Directive is to provide for environmental assessment at a higher, more strategic, level than that of site-specific projects which are dealt with under EIA Directive.

5.3 This is explained in the Foreword to the EC Commission's Guidance as follows:

"The Strategic Environmental Assessment (SEA) Directive is an important step forward in European environmental law. At the moment, major projects likely to have an impact on the environment must be assessed under Directive 85/337/EEC. However, this assessment takes place at a stage when options for significant change are often limited. Decisions on the site of a project, or on the choice of alternatives, may already have been taken in the context of plans for a whole sector or geographical area. The SEA Directive - 2001/42/EC – plugs this gap by requiring the environmental effects of a broad range of plans and programmes to be assessed, so that they can be taken into account while plans are actually being developed, and in due course adopted. The public must also be consulted on the draft plans and on the environmental assessment and their views must be taken into account".

### Environmental Impact Assessment

5.4 Nor has an adequate EIA in accordance with 85/337/EEC been carried out. It is clear that the cumulative effect of separate expansion projects at the airport must be specifically considered in determining the likely environment effects of any proposal (***Schedule 3 to the EIA Regulations (Selection Criteria for Screening Schedule 2 Development)***). Any planned expansion of the airport should be covered by environmental and other assessments associated with that whole expansion package.

## **6. Greenpeace Conclusion**

An average rise in global temperature of 2C above pre-industrial temperatures is widely regarded as the limit beyond which irreversible climate change impacts will occur. Global greenhouse gas emissions, primarily carbon dioxide, have already generated a rise of 0.7C and due to the inbuilt lag in the earth's atmospheric system we are already committed to a further rise of approximately 0.7C. It is therefore clear that the window

of opportunity to limit global temperature rise below 2C is closing swiftly. Climate change impacts are already abundantly evident, but if we fail to constrain our carbon emissions, such that we are on a rapidly decreasing emissions pathway by the end of the next decade, then we can expect that within decades from now climate change will be transformed from a key political agenda item into a threat to global security, economies and resources far greater than any seen in the global conflicts of the 20th century.

It is vital that we act now.

The proposed airport expansion would result in significant increases in UK and international CO2 emissions. In turn this would contribute to global temperature rises with hugely detrimental climate change impacts.

We therefore urge the Government to reject the proposed plans to expand capacity at Heathrow.