

Development of Bristol Airport to Accommodate 12 Million Passengers Per Annum: Carbon Policy Update

1. Introduction

This note provides an update on the current UK carbon policy position following the Committee on Climate Change's (CCC) recent letter¹ to the Secretary of State for Transport. This is in the context of Bristol Airport Limited's (BAL) current planning application² and the associated Environmental Statement (ES) for the development of Bristol Airport to accommodate 12 million passengers per annum (mppa) (the proposed development) that were submitted to North Somerset Council in December 2018.

2. Policy position

Since the ES for the proposed development was prepared, UK carbon policy has evolved. In May 2019, the CCC published the report '*Net Zero: The UK's contribution to stopping global warming*³'. Within it, the CCC recommends that the UK should legislate to reach net-zero greenhouse gas (GHG) emissions by 2050 (and that all sectors of the economy should be covered, including international aviation). It states that the UK should not rely on international offsetting to reach the target. The UK Government subsequently passed the '*Climate Change Act 2008 (2050 Target Amendment) Order 2019*⁴ in June 2019. The Order sets out a target for at least a 100% reduction of GHG emissions (compared to the 1990 levels) in the UK by 2050; this is commonly referred to as the 'net zero' target. International aviation (and shipping) is not formally part of the net zero target, with a continuation of the 'headroom' approach used instead.

In '*Aviation 2050: The future of UK aviation*⁵, the UK Government has indicated that it would accept the CCC's recommendation⁶ that the 'headroom' for aviation is 37.5MtCO₂/annum. This figure was used in Chapter 17 of the ES to contextualise the GHG emissions associated with the proposed development and it has been established that the addition of 2 mppa would represent only 0.28% of the CCC's recommendation, which is not considered to be a significant effect.

On 24th September 2019, the CCC submitted a letter⁷ to the Secretary of State for Transport that responded to the Government's request on how to bring international aviation (and shipping) emissions formally within the UK's net-zero target, setting out the rationale and the implications for the UK's climate strategy. In its letter, the CCC states that the primary approach for reducing international aviation emissions should be international, primarily through the International Civil Aviation Organisation (ICAO) which manages the

¹ The Committee on Climate Change, 2019. Letter: International aviation and shipping and net zero. Available online at: <https://www.theccc.org.uk/wp-content/uploads/2019/09/Letter-from-Lord-Deben-to-Grant-Shapps-IAS.pdf>

² Ref 18/P/5118/OUT.

³ The Committee on Climate Change, 2019. Net Zero: The UK's contribution to stopping global warming. Available online at: <https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

⁴ HM Government, 2019. Climate Change Act 2008 (2050 Target Amendment) Order 2019. Available online at: https://www.legislation.gov.uk/ukdsi/2019/9780111187654/pdfs/ukdsi_9780111187654_en.pdf

⁵ HM Government, 2018. Aviation 2050: The future of UK aviation. Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769695/aviation-2050-web.pdf

⁶ The Committee on Climate Change (2009). Meeting the UK aviation target – options for reducing emissions to 2050. Available online at: <https://www.theccc.org.uk/publication/meeting-the-uk-aviation-target-options-for-reducing-emissions-to-2050/>

⁷ The Committee on Climate Change, 2019. Letter: International aviation and shipping and net zero. Available online at: <https://www.theccc.org.uk/wp-content/uploads/2019/09/Letter-from-Lord-Deben-to-Grant-Shapps-IAS.pdf>

Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)⁸. The CCC also states that the planning assumptions for international aviation should be to achieve net-zero emissions by 2050.

The analysis carried out in support of the CCC letter suggests that aviation emissions could be reduced to 30MtCO₂/annum through a mixture of fuel efficiency gains, sustainable fuels and reduced demand. The 30MtCO₂/annum case is referred to as '2050 Further Ambition'. A '2050 speculative case' which adds alternative fuels and constrained demand reduces the headroom by 40% compared to 2017 levels. With reference to airport capacity, the CCC letter states that "*investments will need to be demonstrated to make economic sense in a net-zero world and the transition towards it*", and that planned growth at Heathrow Airport leaves very limited room for growth elsewhere.

The UK Government is due to publish its Aviation Strategy following consultation on Aviation 2050. In the Green Paper, the Government has stated that it proposes to "*accept the CCC's recommendation that UK-departing flights should be at or below 2005 levels in 2050*". This is the 37.5MtCO₂/annum headroom used to contextualise the ES assessment, which was originally posited by the CCC in 2009⁹.

Until there is a commitment from the UK Government to formally incorporate international aviation into the Climate Change Act 2008 (2050 Target Amendment) Order 2019, there is no policy setting out a target for emissions from the sector in 2050. The Government has indicated in Aviation 2050 that it proposes to accept the 37.5MtCO₂/annum recommendation, and there is no indication that any particular target will be set based on the scenarios developed supporting the CCC letter⁷. As a result, contextualising the proposed development against 37.5MtCO₂/annum remains the correct approach for the Environmental Impact Assessment (EIA), even though that level of emissions is not yet formally incorporated into the Climate Change Act 2008 as a target.

⁸ International Civil Aviation Organisation, 2019. Carbon Offsetting and Reduction Scheme for International Aviation. Website:

<https://www.icao.int/environmental-protection/CORSIA/Pages/default.aspx>

⁹ The Committee on Climate Change, 2009. Meeting the UK aviation target – options for reducing emissions to 2050. Available online at:

<https://www.theccc.org.uk/wp-content/uploads/2009/12/CCC-Meeting-the-UK-Aviation-target-2009.pdf>