

Planning Application 18/P/5118/OUT
Applicant: Bristol Airport (majority owned by
Ontario Teachers' Pension Plan, Canada)
Submission to North Somerset District Council by the
Parish Councils Airport Association

Addendum 13 - Moratorium on all airport expansion
planning applications

The PCAA is submitting the letter below from the Aviation Environment Federation for consideration. The PCAA is a member of the Federation and also the Aviation Communities Forum and fully supports the letter. The letter indicates, as we have previously shown in our submissions, that policy on aviation emissions is in a state of flux. But the Government has recently, as we have identified, stated that in relation to carbon emissions the UK law now requires all UK greenhouse gas emissions to reduce to net zero emissions. The PCAA fully expect NSC to delay the application until the appropriate policies on the aviation sector are put into place which are expected early 2020 or to consider all emissions in current planning applications.

Letter from Aviation Environment Federation

The Rt Hon Grant Shapps MP
Secretary of State for Transport Department for Transport
33 Horseferry Road
London,
SW1P 4DR

The Rt Hon Robert Jenrick MP Secretary of State for Housing,
Communities and Local Government 2 Marsham Street
London,
SW1P 4DF

22 October 2019

Dear Secretaries of State

MORATORIUM ON AIRPORT EXPANSION PLANNING APPLICATIONS

We are writing to ask you to suspend the determination by all planning authorities of applications to increase the physical capacity of UK airports, or their approved operating caps, until there is a settled policy position against which such applications can be judged.

Many UK airports including Belfast, Bristol, East Midlands, Gatwick, Glasgow, Heathrow, London City, Luton, Manston, Newcastle and Stansted are seeking or have

announced their intention to seek planning approval to increase their capacity and/or their operating caps. In aggregate it has been estimated that proposals announced by UK airports would increase the country's airport capacity by nearly 200 million passengers per annum. That would be an increase of over 70% compared to 2017.

There is currently, in our view, no settled policy position against which planning authorities can reasonably assess and determine such applications or that adversely impacted communities can reference in seeking to contest applications or seek conditions to them.

The most significant gaps in the policy framework concern greenhouse gas emissions and noise. CHAIRMAN Richard K Roads DIRECTOR Tim Johnson Registered in England and Wales as a company limited by guarantee number 03467343 In relation to greenhouse gas emissions, UK law now requires all UK greenhouse gas emissions to reduce to net zero by 2050. The government has confirmed to Parliament that this obligation covers the whole economy including aviation. However, it has not set out the policies and mechanisms that will apply to aviation in respect of this legal obligation.

The Committee on Climate Change (CCC) has recently advised that "Measures should be put in place to limit growth in demand to at most 25% above current levels by 2050". It also advised that "The Government should assess its airport capacity strategy in the context of net zero. Specifically, investments will need to be demonstrated to make economic sense in a net-zero world and the transition towards it".

The CCC also notes that "*Current planned additional airport capacity in London, including the third runway at Heathrow, is likely to leave at most very limited room for growth at non-London airports*".

There is a clear inconsistency between the UK's net zero legal obligation and the CCC's advice on the one hand and the scale of the expansion being proposed by the industry on the other. The government has indicated in its response to the CCC's 2019 Progress Report, that it will be consulting further on aviation and climate change, with a view to publishing a new policy in 2020. Until it has done so we believe there is a state of fundamental uncertainty such that it is not possible for planning authorities to determine airport expansion applications.

In relation to noise, the government's Green Paper, Aviation 2050, proposed a new objective "*to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise*". The government has also stated in the Green Paper that the aim of noise caps will be to balance noise and growth and that there should be appropriate compliance mechanisms. Finally it has stated that its new policy framework will reduce the harmful effects of aviation on the environment, such as carbon emissions, air quality and noise.

However, the government has not yet explained or provided any guidance on the factors that should be taken into account in setting noise limits, or on the circumstances in which it considers noise reductions should be possible or the relationship it expects to see between growth and noise reduction. In the absence of additional policy guidance in these areas we do not believe it is possible for planning

authorities to assess whether airport's proposals are consistent with the government's aviation noise policies or to set appropriate noise conditions when considering applications for growth.

In summary, until a settled policy with set limits is established for greenhouse gas emissions and noise there should be a moratorium on all airport expansion planning applications.

Yours sincerely,

Tim Johnson, Director, Aviation Environment Federation
Peter Barclay, Chair, Gatwick Area Conservation Campaign
Andrew Lambourne, Luton And District Association for the Control of Aircraft Noise
Charles Lloyd, Chair, Aviation Communities Forum
Peter Sanders, Chair, Stop Stansted Expansion
John Stewart, Chair, Heathrow Association for the Control of Air Noise

Cc: Paul Maynard MP, Parliamentary Under Secretary of State, Department for Transport
Robert Light, Lead Commissioner, Independent Commission on Civil Aviation Noise