

# Call for Evidence

## Airport expansion and climate and nature targets

The Environmental Audit Committee is seeking views on the Government's plans to support the expansion of airport capacity in the UK while ensuring its targets relating to climate and the environment continue to be met<sup>1</sup>.

Written response of Marj Powner (Chair, Friends of Carrington Moss, Vice Chair, Save Greater Manchester's Green Belt Group, Vice Chair, Community Planning Alliance)

### Questions and Responses

#### *Expanding airport capacity within the Government's climate and environmental obligations*

1. Which statutory targets and which non-statutory obligations (both national and international) relating to climate and the environment apply to Government policy on (a) the development of UK airport capacity in general and (b) the development of Heathrow and other airports in the South East of England in particular?

Other respondents will be more qualified to provide feedback on this question.

2. What effect the enactment of proposed legislation to include international aviation emissions within the Sixth Carbon Budget and subsequent budgets will have on the UK's ability to meet its climate commitments in respect of aviation?

Other respondents will be more qualified to respond to this question but should the inclusion of such data result in concerns about the UK's ability to meet its climate commitments, this should not result in any weakening of the ambitions, which would be a betrayal of future generations. More effort should, instead, be placed on solutions which will support the ultimate goals including, for example, more focus on, and investment in, sustainable passenger and freight transport (rail/water), restoring the UK's peatmoors (and other nature-based options), rather than building on them or funding non-proven technology solutions that are likely to increase carbon emissions.

3. What emissions reductions from domestic and international aviation are currently likely to be required to meet the Sixth Carbon Budget; and what effect the Government's policy on airport expansion is likely to have on the ability to deliver these reductions?

Other respondents will be more qualified to provide feedback on this question.

#### *Scope for development within current climate and environmental obligations*

4. What projections have been made for the demand for passenger and freight capacity at UK airports by 2050; and to what extent current proposals for expansion of airport capacity in England meet these projections?

Other respondents will be more qualified to provide feedback on this question but as mentioned above, there should be more focus on, and investment in, sustainable passenger and freight transport (rail/water).

5. What projections have been made for the likely climate and environment impacts of domestic and international aviation from UK airports by 2050 in relation to the latest Government estimates of aviation and airport growth?

Other respondents will be more qualified to respond to this question but please ensure that any projections are detailed enough to enable appropriate assessments to be made (detailed carbon emissions calculations, for example, not a 'back of a fag packet' estimate).

---

<sup>1</sup> [https://committees.parliament.uk/call-for-evidence/3647/#\\_ftn2](https://committees.parliament.uk/call-for-evidence/3647/#_ftn2)

## Call for Evidence

### Airport expansion and climate and nature targets

6. What projections have been made concerning the contribution of (a) technological innovations in aviation (b) aviation emissions trading schemes and (c) changes in airport operations to reducing overall emissions from UK domestic and international aviation; and to what extent aviation emissions are expected to be offset by carbon removals elsewhere to ensure that the UK meets net zero by 2050?

Other respondents will be more qualified to provide feedback on this question.

#### *Review of the Airports National Policy Statement*

7. To what extent the provisions of the current Airports National Policy Statement (ANPS) approved by Parliament in June 2018 and designated under the Planning Act 2008 are supported by current evidence and projections on (a) aviation growth and (b) the climate and environmental effects of aviation and airport development?

We would draw the Committee's attention to the UK's National Biodiversity Strategy and Action Plan for 2030<sup>2</sup>, which confirms that, in England, *"the 13 statutory targets under the Environment Act 2021 were the result of four years of significant scientific evidence collection and development, with input from external evidence partners and independent experts, alongside public consultations on their scope and levels"*.

This demonstrates the criticality of ensuring scientific evidence is collected and analysed at a level that enables a clear understanding of the climate and environmental/ecological impacts of aviation and airport development. Evidence which compares the benefits of airport expansion to, for example, more focus on, investment in, and incentives to use, more sustainable passenger and freight transport options, should be provided.

It should be clear to those preparing the evidence that the term *"relevant market signals"* (referenced in NPPF paragraph 32) should be applied to all elements of our natural capital that may be impacted by airport expansion, including, for example, climate mitigation (carbon implications, flooding), biodiversity loss (habitat and species depletion), the rural economy, the UK holiday economy, their supply chains, etc. It is inappropriate that only the *"relevant market signals"* related to the desired development is covered in such analysis.

Any claims made about environmental or ecological impacts should be substantiated via formal evidence.

With the above in mind, it is essential that principles similar to those set out in the Green Claims Code<sup>3</sup> **MUST** be introduced into the ANPS. These would also support any monitoring or enforcement regimes. The principles would require that, for any environmental or ecological assertions made:

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service [an airport expansion, for example]
- claims must be substantiated.

---

<sup>2</sup> [https://uk.chm-cbd.net/sites/gb/files/2025-02/UK\\_National\\_Biodiversity\\_Strategy\\_and\\_Action\\_Plan.pdf](https://uk.chm-cbd.net/sites/gb/files/2025-02/UK_National_Biodiversity_Strategy_and_Action_Plan.pdf)

<sup>3</sup> <https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services>

## Call for Evidence

### Airport expansion and climate and nature targets

8. Whether the scope of the current ANPS remains appropriate given current and expected proposals for development of runway capacity and infrastructure at airports in the South East of England?

Other respondents will be more qualified to provide feedback on this question.

9. What conditions the Government ought to include in a revised ANPS to ensure that airport expansion can be delivered within (a) the UK's international climate commitments and statutory national obligations and (b) the UK Government's environmental targets for England?

The ANPS should explicitly state that the expansion must be designed to secure proven contributions to the delivery of the UK's climate commitments, statutory national obligations and the UK government's environmental targets.

There should be more consideration about the desired outcomes in relation to the achievement of net zero by 2050, the climate and environmental effects of aviation/airport development and the pros and cons of expansion, which should include, for example:

- How much public money will need to be invested, what benefits are likely to accrue (and when) and how sustainable will the development actually be (see below) – how will employees, freight and passengers travel to the airport, what natural capital assets will be lost to development, etc?
- Whilst there may be a number of short term (temporary) construction jobs, how many full time, permanent jobs will be created? This number should be compared with the potential for job losses in the rural economy or a lack of job creation in the UK holiday industry, for example. The government should not support a move away from more domestic 'staycation' holidays, which would bring growth, investment and retain spend in the UK.
- What are the more sustainable alternatives (as mentioned above, there is currently insufficient focus on, and investment in, rail/water-based transport options, there should be incentives to encourage passengers and freight to make journeys by more sustainable transport)?
- How will environmental and ecological harms be minimised and environmental/ecological outcomes maximised (with safeguards for irreplaceable habitats)?
- How will local communities be consulted? There should be conformance with a specific community agreed (Gunning<sup>4</sup> compliant) Statement of Community Involvement. Citizens' panels should be a requirement to ensure the priorities of residents are considered, using a representative panel of citizens within the airport authority area that has been impartially selected. Increasing the visibility and understanding of planned changes, the reasons for them and the benefits they will bring, will empower communities to have their say about decisions that will affect their lives, and those of their children and grandchildren. The local community will be more aware of the impact of the proposals than any other stakeholder, including the local authority. The ANPS should also advocate engagement with schools to ensure that those who are likely to be most affected by longer term plans are able to have a voice.

10. What appraisals of sustainability the Government ought to conduct in preparing a revised ANPS?

Regulations should ensure there is a clear definition of sustainable development. The current definition of sustainable development is set out in the NPPF (paragraph 7).

---

<sup>4</sup> <https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

## **Call for Evidence**

### **Airport expansion and climate and nature targets**

A more detailed definition of sustainable development should be agreed as Council staff, developers and the planning inspectorate appear to limit the term to the materials a building, road or runway is constructed with, rather than taking into consideration (for example) current land use, the availability of sustainable passenger and freight transport and the environmental harms to be caused by the proposals.

Put simply, a definition is needed that ensures development is delivered without the depletion of natural resources or damage to irreplaceable habitats, and does not cause increased flooding, air, noise, light, vibration or water pollution or carbon emissions.

#### *Ensuring continued compliance with climate and environment obligations*

11. What arrangements ought to be made to keep airports and aviation policy under review to ensure that climate and environment obligations continue to be met?

The ANPS should ensure that there is a comprehensive monitoring regime to scrutinise the actual impact of the policy. The regime should include the expected benefits and impacts of the airports and aviation policy (baseline data which includes, as a minimum, the suggested information mentioned in this response) and should monitor trends to ensure the anticipated outcomes are met.

Monitoring evidence should include detailed carbon emissions data, any increase in local flood risk, the impact of air, noise, light, vibration and water pollution on human, habitat and species health, detailed assessment of the change of land use (if, for example, the land to be used for the expansion is currently productive best and most versatile agricultural land, what is the impact on future food security, how will the rural economy (including supply chains) be impacted, such as the loss of livelihoods and homes).

The cost of the impact of increased pollutions, for example, will hit the public sector via the NHS (in terms of both physical and mental health treatment) and should be taken into consideration when assessing the effects of airport expansion.

12. What policy safeguards Ministers ought to offer to ensure that the climate and environmental impacts from domestic and international aviation continue to be mitigated in a way consistent with these obligations?

Clearly an airport expansion is not something that can easily be reversed if it is not found to be delivering the expected benefits or is resulting in higher levels of harm than those anticipated. If airport expansion is to be agreed, despite the environmental impacts, the government should introduce a pilot programme to determine whether the outcomes accord with the ambition to achieve net zero by 2050 and other strategic objectives, with a requirement that, if climate and environmental obligations cannot be met, further expansion cannot go ahead.

In addition to the impact on natural capital assets, the current proposals will have the highest impact on the most vulnerable in our society, who will suffer from a loss of local access to nature and an increase in environmental injustice (for example, increased flooding, air, noise, light, vibration and water pollution). The government should ensure airport expansion genuinely meets the requirements of the public sector equality duty and the Equality Act.