



Planning application reference: 09/01960/FULM

**Letter of Objection
December 2009**

Summary

Greenpeace wholly opposes the application being made by London Southend Airport Company Ltd to extend Southend airport runway in order to increase capacity.

Greenpeace opposes the application on the grounds that it would contribute to significant increases in greenhouse gas emissions which are causing devastating climate change.

The Government's aviation policy, under which this application is being made, is to reduce emissions from aviation to 2005 levels by 2050¹. The Committee on Climate Change has this week reported back to the Government on how it can meet this target, and Lord Adonis, Secretary of State for Transport has welcomed the report².

The Committee recommends that in order to meet the target, demand growth will have to be constrained and that "deliberate policies to limit demand below its unconstrained level are therefore essential if the target is to be met."³ They have recommended that passenger numbers must be limited to 370 million by 2050, and Air Traffic Movements (ATMs) must be limited to 3.4 million by 2050 to meet the target. The Government has said it "will now engage in further work, in particular costing and assessing the policy options available to us, to enable us to give effect to the committee's advice"⁴. Consequently, under this new target, it is likely that across the UK, only a percentage of the expansion proposals currently envisaged will now be able to go ahead.

In this context, the council must reject this application.

The negative impact that the proposed expansion would have on local communities, and the inevitable increases in noise, local air pollution and road traffic that expansion would lead to, are additional reasons why the application cannot and should not be supported by the council.

We therefore urge the council to reject the application outright.

1. Greenpeace

1.1 Greenpeace UK is the autonomous regional office of Greenpeace, one of the world's leading environmental campaigning organisations. 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 Statement to Parliament by Geoff Hoon, Secretary of State, to Parliament 15 January 2009

² Lord Andrew Adonis, Secretary of State for Transport, speech at the Committee on Climate Change report launch

³ Committee on Climate Change Aviation report, 8th December 2009, page 3

<http://www.theccc.org.uk/reports/aviation-report>

⁴ Lord Andrew Adonis, Secretary of State for Transport, speech at the Committee on Climate Change report launch

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 (IPCC). 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. Greenpeace is currently engaged as official observers within the UN Climate Negotiations that are taking place in Copenhagen (COP 15).

2. Aviation policy context

2.1 When the Government announced its support for a third runway at Heathrow airport, part of its justification was that the Government was simultaneously introducing a new target to reduce aviation emissions to 2005 levels by 2050⁵. It then tasked the Government's Committee on Climate Change with reporting on how this target might be met.

2.2 On the 8th December 2009, the Committee on Climate Change reported back to the Government. The report sets out three scenarios for aviation emissions between now and 2050, labeled 'likely', 'optimistic' and 'speculative'. New policies to speed up the pace of fleet renewal and air traffic management, revolutionary new aircraft technologies and the biofuel from algae, which feature in the optimistic and speculative scenarios should not be relied on to deliver carbon cuts, the Committee say. Government policy should instead be based on its likely scenario, which assumes a 0.8% per annum improvement in fleet fuel efficiency and 10% takeup of aviation biofuels by 2050. However, they say that these factors alone will not be enough and that "deliberate policies to limit demand below its unconstrained level are therefore essential if the target is to be met."⁶

2.3 The committee has recommended that if these factors do come about in reality and additional policies are put in place, then passenger demand could be allowed to increase to around 60% from 2005 levels. This would mean that passenger numbers must be limited to 370 million by 2050, and Air Traffic Movements (ATMs) must be limited to 3.4 million by 2050.

2.4 These limits represent a significant departure from the Government's Air Transport White Paper and subsequent projections of demand. The ATWP has been premised on delivering capacity of between 410m and 480m passengers per year⁷ by 2030. The Committee on Climate Change modeling shows that on this trajectory, additional policies will be needed to constrain demand, to ensure that passenger numbers do not reach between 490 million and 695 million passengers by 2050⁸ as projected.

2.5 The Committee also notes that the Government's target currently refers only to carbon dioxide, yet they acknowledge that "it is highly likely that these non-CO2 effects are significant"⁹

⁵ Statement to Parliament by Geoff Hoon, Secretary of State, to Parliament 15 January 2009

⁶ Committee on Climate Change Aviation report, 8th December 2009, page 3

<http://www.theccc.org.uk/reports/aviation-report>

⁷ Department for Transport, UK Air Passenger Demand and CO2 Forecasts, January 2009 <http://www.dft.gov.uk/pgr/aviation/atf/co2forecasts09/co2forecasts09.pdf>, P130

⁸ Meeting the UK aviation target – options for reducing emissions to 2050, Committee on Climate Change Report, December 2009, Figure ES.3 Reference demand projections, page 15

⁹ Ibid, page 20

and “will therefore need to be accounted for in future international and UK frameworks”¹⁰. If the non-CO2 impacts, such as increases in nitrogen dioxide and cirrus-cloud formation, were to be taken into account, the emissions budget available for aviation may, in future, need to be halved.

2.6 The report by the Committee on Climate Change and the response from Lord Andrew Adonis means that Government policy will now need to limit expansion across the UK. In this context, no additional expansion proposals can currently be considered. For this reason, Southend Council must reject this application.

2.7 Furthermore, given the growing scientific understanding of climate change, the increasing urgency with which we must reduce emissions, and the Committee’s recommendation that non-CO2 effects of aviation will have to be accounted for in the future, it is likely that the 2050 target for aviation is very likely to have to be tightened. Permitting any expansion in aviation emissions (and the consequent road emissions that this would lead to) in this context would be wholly irresponsible.

3. Planning application reference: 09/01960/FULM

3.1 In addition to increasing carbon and other greenhouse gas emissions, an increase in capacity at Southend Airport would inevitably lead to increased noise and air pollution which would negatively affect residents close to the airport and under flight paths.

3.2 The development would also lead to significant increased road traffic which would have huge local impact in terms of spatial planning and would also create additional greenhouse gas emissions. We note that pressure on the A127 in particular would be untenable, and that there are no adequate proposals from either the airport or Southend Council with which to deal with this situation.

3.3 In this context, to accept the application by London Southend Airport Company Ltd to extend the airport runway in order to accommodate up to 2 million passengers is simply unjustifiable and would be irrational.

4. Conclusion

4.1 In 1966 the government inspectorate of the day rejected a similar application to extend the North-West runway on environmental grounds. For all of the reasons set out above, the Council again has only one option with regard to this application: it must reject it.

¹⁰ Ibid, page 9