

Environmental Audit Committee

Airport expansion and climate and nature targets

Fifth Report of Session 2024–26

HC 831

Environmental Audit Committee

The Environmental Audit Committee is appointed by the House of Commons to consider to what extent the policies and programmes of government departments and non-departmental public bodies contribute to environmental protection and sustainable development; to audit their performance against such targets as may be set for them by His Majesty's Ministers; and to report thereon to the House.

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Summary

In January the Government announced that it would support and encourage airport expansion in the UK as a driver to deliver the goal of economic growth. At the time there were a number of proposals for airport expansion, primarily around the South East of England, including Heathrow, Stanstead, Luton, London City, Gatwick as well as the reopening of Doncaster-Sheffield. Several of these have now been agreed by the Government.

Whilst the Government support for airport expansion has been largely based on its expectation of economic growth, the Government has been unable to direct the Committee to any evidence that supports its assertion.

Furthermore, the current planning system for airport expansion is underpinned by the Airports National Policy Statement which was published prior to significant policy changes including the legislation of Net Zero by 2050. This has left policy gaps, particularly around the consideration of airport expansion impacts on key climate, environmental and biodiversity measures and the cumulative effect of all expansion proposals together.

Prior to any airport expansion, the aviation sector was already projected to be one of the slowest decarbonising sectors in the UK. Whilst the Government is providing support on a number of fronts to mitigate the climate impact of aviation and the sector itself is taking steps to do so, we heard from the Minister the Government is not supportive of demand management, a measure that the Climate Change Committee highlighted as fundamental to the UK delivering on its Net Zero target.

The mitigation measures the Government is relying on to decarbonise the industry, primarily Sustainable Aviation Fuel, efficiency savings and emissions offsetting, each have their limits. However, the Government has so far not factored in these limitations. This leaves substantial risk to the UK target of Net Zero by 2050.

There is more that the Government can do to reduce non-CO₂ emissions, such as contrails. The UK is ideally placed with leading academics and research centres to develop approaches, such as new flight paths, and new engine technology, to reduce their impact. The Government should also support and incentivise aircraft that use technology that reduces damaging non-CO₂ pollutants around airports which impact air quality adversely.

It is important that emissions associated with travel to and from airports are addressed. The Government should set out how it can better connect existing public transport to airports to reduce emissions from cars and other vehicles.

The Government must make Parliamentary time available to formally include the UK's share of international aviation emissions within Carbon Budgets and its Net Zero targets. This has been recommended by the Climate Change Committee, our predecessor Committee, and was accepted by the previous Government but not enacted.

The Government is yet to set out how it will ensure climate, environment and biodiversity targets can be delivered whilst consenting to airport expansion; and what level of economic growth the UK can expect from this significant infrastructure development. The Government should do so at the earliest opportunity.

1 Introduction

1. In January 2025, the Government announced that it would support and encourage airport expansion in the UK in pursuit of economic growth.¹ There are now a number of plans for airport expansion, primarily around the South East of England, including Heathrow, Stanstead, Luton, London City, Gatwick, but also the reopening of Doncaster-Sheffield.
2. This comes after the Climate Change Committee called for no airport expansion until a framework for managing demand for air travel was in place as, in their opinion, aviation demand management will need to make up the largest proportion of emissions reductions for the sector.²³ The CCC states that any plan to increase airport capacity needs to be based on projections of future demand which are consistent with climate change targets and take account of the costs to the sector of getting aviation to Net Zero emissions.⁴
3. The aviation sector and the UK as a whole has committed to achieving net zero carbon emissions by 2050.⁵ Since 2005, Sustainable Aviation claims that UK aviation emissions have stabilised despite a 30% growth in passengers carried.⁶ Notwithstanding this, in 2024 the aviation sector's emissions increased and contributed to a greater share of UK emissions than the entire electricity supply sector.⁷ The Climate Change Committee (CCC) has projected that the aviation sector will be the largest polluter in the UK by 2040.⁸ The CCC further state that emissions in aviation are very

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- 1 Department for Transport, [Government update on airport expansion](#), 30 January 2025
 - 2 The CCC set out the Balanced Pathway, an emissions reduction pathway out to 2050 which is produced by the Climate Change Committee and is in line with the UK's legislated Carbon Budgets and stated Nationally Determined Contributions. For more information please see: [The Seventh Carbon Budget](#).
 - 3 Climate Change Committee, [Progress in reducing emissions 2024 Report to Parliament](#), July 2024
 - 4 Climate Change Committee, [Progress in reducing emissions 2025 report to Parliament](#), June 2025
 - 5 Sustainable Aviation, [Net Zero Carbon Road-Map](#)
 - 6 Sustainable Aviation ([AECN0052](#))
 - 7 Climate Change Committee, [Progress in reducing emissions 2025 report to Parliament](#), June 2025
 - 8 Climate Change Committee, [Seventh Carbon Budget](#), February 2025

close to the limit of its projected path to reach net zero and are increasing. If this increase in emissions continues, the sector will likely pose a risk to the UK's emissions targets.⁹

4. There is a significant divide—both politically, and between industry and campaign groups—as to the necessity and level of support for airport expansion. The evidence to the Committee shows considerable disagreement over the estimated costs and benefits of expansion. Supportive voices claim it would provide significant economic and social benefits while minimally impacting the environment, while those against expansion believe the impact will be too damaging to the climate and local environment with the economic benefits being less certain and unsubstantiated.

5. For example, AirportsUK, the trade association for UK airports, states

Sustainable expansion at airports will ensure that the UK can continue to benefit from the economic growth that ensues from better global connectivity, while also providing a favourable environment for further investment in sustainable solutions.¹⁰

On the other hand, researchers from the University of Manchester state that: “Current government support for aviation expansion is incompatible with the UK’s legally binding climate commitments.”¹¹

9 Climate Change Committee, [Progress in reducing emissions 2025 report to Parliament](#), June 2025.

10 AirportsUK ([AECN0046](#))

11 Dr Lois Pennington (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester); Professor Alice Larkin (Professor of Climate Science and Energy Policy at The Tyndall Centre for Climate Change Research, The University of Manchester); Dr Gaurav Gharde (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester) ([AECN0027](#))

Box 1: Key environmental aviation policies

- **Airports National Policy Statement:** The policy framework for expansion at Heathrow Airport and primary basis for decision making on any development consent application for a new runway. It sets out the need for new airport capacity in the South East of England, the Government’s preferred location and considerations relevant to a development consent application.¹²
- **Jet Zero Strategy:** The strategy for delivering a decarbonised aviation sector alongside policy measures focused on system efficiencies, Sustainable Aviation Fuels, Zero Emission flight, markets and removals, influencing consumers and addressing non-CO₂; as well as a five-year delivery plan.¹³
- **Flightpath to the Future:** The Government’s plan for delivering a modern, innovative and efficient aviation sector over the period of 10 years.¹⁴

About the inquiry and report

6. This Committee has a range of views on net zero and the desirability of airport expansion more generally. This report seeks to examine whether the Government can deliver airport expansion and meet the environmental goals that it has signed up for, regardless of our views on what those goals might be. This was fully in keeping with our remit to “consider the extent to which the policies and programmes of government departments and non-departmental public bodies contribute to environmental protection and sustainable development, and to audit their performance against sustainable development and environmental protection targets”.¹⁵
7. We received 61 pieces of written evidence and heard oral evidence from 19 witnesses across six panels. We heard from charities and campaign groups, think tanks, academics, consultants, the airport and aviation industry, the Planning Inspectorate, local council representatives and Mike Kane MP, the then Parliamentary Under-Secretary of State from the Department for Transport (“the Aviation Minister”) alongside Government officials from both the DfT and DESNZ. We also visited the Aviation Impact Accelerator in Cambridge where we heard from academics and experts in aviation

12 Department for Transport, [Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England](#), June 2018

13 Department for Transport, [Jet Zero Strategy](#), 19 July 2022

14 Department for Transport, [Flightpath to the Future](#), 26 May 2022

15 See: EAC, [Environmental Audit Committee](#), (accessed 15 October 2025)

technology and fuel development. We would like to thank all those who submitted and gave oral evidence and to the Aviation Impact Accelerator who hosted us.

2 Economic considerations

8. This chapter explores the various economic arguments surrounding airport expansion. These include the level of available information to make informed assessments, the extent to which such expansion is likely to provide economic growth and how the current plans for expansion will impact areas outside of the South East of England. Economic growth is the main argument made by Government¹⁶ and the aviation industry in support of expansion.¹⁷

Box 2: Airport expansion plans

At the time of writing, the expansion plans are:

- **London City** – from 6.5 million passengers per annum to 9 million passengers per annum (approved).¹⁸
- **Luton** – from 18 million passengers per annum to 32 million passengers per annum (approved).¹⁹
- **Gatwick** – from 46 million passengers per annum in 2019 to 67.2 million passengers per annum by 2047 (approved), with possible additional expansion to 80 million passengers per annum by 2047 (approved).²⁰
- **Stansted** – from 29 million passengers per annum to 43 million passengers per annum (approved),²¹ with possible additional expansion to 51 million passengers per annum (awaiting decision).²²
- **Heathrow** – from 84 million passengers per annum to 150 million passengers per annum (awaiting decision).²³
- **The Government has also announced support for the reopening of Doncaster-Sheffield airport, which had 1.4 million passengers in 2019.**²⁴

16 Department for Transport, [Government update on airport expansion](#), 30 January 2025

17 Sustainable Aviation ([AECN0052](#)), Manchester Airports Group (MAG) ([AECN0054](#)), Airlines UK ([AECN0055](#)),

18 Department for Transport, [Government update on airport expansion, 30 January 2025](#)

19 Department for Transport, [Secretary of State for Transport decision letter](#), 3 April 2025

20 GOV.UK, [Gatwick Airport Northern Runway development consent decision announced](#), (22 September 2025).

21 London Stansted Airport, [London Stansted Airport Terminal Extension – Public Consultation](#), accessed August 2025

22 London Stansted Airport, [London Stansted submits planning application to unlock potential of existing runway](#), 9 June 2025

23 Heathrow, [Our Proposal For Expanding Heathrow](#),

24 Civil Aviation Authority, [Size of Reporting Airports 2024 Comparison with 2019](#)

2.1 Economic impact of the airport and aviation industry

9. There is no definitive view on the economic impact of the airport and aviation industries on the UK. In 2023, the International Air Transport Associated (IATA) estimated that the aviation industry provided around £30 billion to the UK economy, equivalent to 1.2% of GDP, though this could reach as high as 5% of GDP when taking wider effects into account.²⁵²⁶ In written evidence provided to the Committee, AirportsUK, the airport industry trade body, claimed that the airport industry accounted for £27 billion of Gross Value Added (GVA),²⁷ and inbound tourism provided £8.2 billion of GVA to the UK economy.²⁸ Logistics UK, a UK logistics trade body, told the Committee that the air freight trade sector contributes £7.2 billion annually to the UK economy.²⁹
10. However, witnesses Andrew Meaney, Partner and Head of Transport at Oxera and Dr Alex Chapman, Senior Economist at the New Economics Foundation agreed that when taking wider effects into account, such values can be affected to some extent by double counting.³⁰³¹ Jobs created through airport functions, such as retail and hospitality, may just move economic benefit from another part of the economy.³² The consultancy CE Delft also warned of the risks of double counting in a report.³³

There is one main reason why adding all the impacts together results in double counting: certain impacts are calculated locally, whereas others are calculated for the UK as a whole. Certain effects may be

25 [Q64](#)

26 Wider effects are generated through the wider supply chain, employee spending and tourism activities. More information can be found at: [The value of air transport to the United Kingdom](#).

27 Gross Value Added, GVA, is an economic productivity metric that measures the economic contributions of producers, industries, sectors and regions to economies. For more detail, please see [Gross Value Added \(GVA\): Definition, Formula, and Example](#)

28 AirportsUK ([AECN0046](#))

29 Logistics UK ([AECN0021](#))

30 Double counting is an error that occurs when a total is obtained by summing gross amounts instead of net amounts. For example, finding the total product of an economy by adding up the gross sales of each enterprise, without subtracting purchases of inputs from other enterprises, involves double counting. For more information please see: [Double counting - Oxford Reference](#)

31 [Q64](#)

32 [Q65](#)

33 CE Delft, [Review of the economic impact analysis of the expansion of London City Airport](#), February 2020

additional at the local level but may not be additional at the national level. Therefore, these two different scopes result in possible double counting.³⁴

2.2 Growth from airport expansion

11. Some analysis shows that a 10% increase in direct flights could contribute around 0.5% to GDP though this is not certain,³⁵ and this is based on data that is more than 20 years old.³⁶ Further evidence of potential growth, from Heathrow expansion specifically, was published by Frontier Economics in January 2025. This report, commissioned by Heathrow, found that a third runway would provide an additional 0.43% to UK GDP by 2050,³⁷ but this modelling has been challenged by Dr David Metz, former Chief Scientist at the Department for Transport, who claims the kind of modelling used in this study has gained “little credence” previously.³⁸
12. This uncertainty in the Government’s economic argument was highlighted by a number of evidence submissions to the Committee.³⁹ For example, Possible, a climate charity, told the Committee:

The government has been clear that their support for airport expansions is based on the assumption that this will deliver economic benefits and grow the UK’s economy. However, we suggest that not only has this case not been convincingly made, but that the counter-arguments demonstrating that airport expansion would be a net loss to the UK’s economy are extremely strong.⁴⁰

Additionally, evidence we received suggests that British tourists travelling internationally spend more money abroad than is received through tourists coming to the UK, accounting for a deficit of around £40 billion per year.⁴¹

34 CE Delft, [Review of the economic impact analysis of the expansion of London City Airport](#), February 2020. Page 13

35 [Q64](#), SEO Amsterdam Economics, [THE ECONOMIC AND SOCIAL IMPACT OF EUROPEAN AIRPORTS AND AIR CONNECTIVITY](#)

36 [Q65](#)

37 Frontier Economics, [Heathrow Expansion Benefits Executive Summary](#), 29 January 2025

38 Dr David Metz (honorary professor at Centre for Transport Studies, University College London) ([AECN0004](#))

39 Dr David Metz (honorary professor at Centre for Transport Studies, University College London) ([AECN0004](#)), New Economics Foundation ([AECN0005](#)), Stephen Clark and David Gilbert (both members of TAG (community organisation) at Teddington Action Group (TAG)); Clark and Gilbert ([AECN0007](#)), Jeremy Rodell ([AECN0009](#)), Bristol Airport Action Network ([AECN0010](#)), Munira Wilson (Member of Parliament at UK Parliament) ([AECN0012](#)), Possible ([AECN0014](#))

40 Possible ([AECN0014](#))

41 [Q69](#), Bristol Airport Action Network ([AECN0010](#)), Possible ([AECN0014](#))

It is possible that an increase in airport capacity would increase this tourism deficit and lead to further financial impacts on the UK domestic tourism industry.⁴² For example, the Bristol Airport Action Network claim that the “UK’s travel spending deficit [is] starving domestic leisure and tourism industries, and particularly the UK’s wider regions of cash.”⁴³

13. The then Aviation Minister, Mike Kane MP, when appearing before the Committee, could not direct us to any substantial economic analysis that supports the Government’s claim that airport expansion would lead to growth, but stated that this would be published alongside the updated Airports National Policy Statement.⁴⁴ He also could not inform us of what level of growth the Government expects from going ahead with airport expansion. This is despite the Government already approving expansion of airports such as Stansted,⁴⁵ Luton⁴⁶ and Gatwick.⁴⁷ This suggests to us that the Government is proceeding without the necessary evidence base to sufficiently underpin its economic arguments for airport expansion.

14. **CONCLUSION**

While airport expansion is likely to provide some economic growth through growth of the aviation sector, the level of growth to the UK economy provided by airport expansion is unclear and the Government has so far failed to provide substantial supporting evidence.

15. **RECOMMENDATION**

Before formally agreeing any airport expansion plans, the Government should:

- 1) Commission more detailed and serious research into the net economic benefits.
- 2) Clearly set out what level of growth to the UK economy it expects. This should be broken down into both individual and cumulative airport expansions.
- 3) This should be done in a timely fashion to allow effective scrutiny of its plans and opportunities for challenge before a final decision is made. We recommend that the Government sets out in its response to this report how it will do this.

42 New Economics Foundation, [The economic impact of airport expansion in the south-east](#), January 2025

43 Bristol Airport Action Network ([AECN0010](#))

44 [Qq213–220](#)

45 London Stansted Airport, [Planning permission granted to extend terminal](#), 31 October 2023

46 Planning Inspectorate, [London Luton Airport Expansion development consent decision announced](#), 03 April 2025

47 GOV.UK, [Gatwick Airport Northern Runway development consent decision announced](#), (22 September 2025).

2.3 The impact of South East expansion on regional airports and economies

16. Currently, the majority of flights in the UK land and take off from London airports, and planned expansion continues to be focused around the South East.
17. The ANPS highlights that while expansion of Heathrow will see some passenger displacement from other airports, they still expect to see strong growth in passenger numbers by 2050 for regional airports. Additionally, the majority of regional airports support Heathrow expansion as the UK hub⁴⁸ which would allow for greater connectivity to the regions.⁴⁹ This was supported by the Regional and Business Airports Group, who told the Committee that “the strong link between aviation, connectivity and economic vitality is well researched and recognised” and “an expanded Heathrow offers the prize of better globalising the UK’s regions and Nations.”⁵⁰
18. This same argument has not been made for the other non-hub London airports such as Gatwick and Stanstead. Analysis published by Frontier Economics and commissioned by Heathrow, shows that expansion of Heathrow airport would have a positive economic impact on all regions to varying degrees due to impacts on productivity,⁵¹ though it did acknowledge that the biggest impact will be on London and the South East.⁵² Logistics UK supported this position and argued that air freight supports regional industries, and Heathrow is the UK’s primary air freight hub.⁵³
19. Department for Transport analysis of Heathrow expansion, released following a Freedom of Information Act request, found that 27,000 aviation industry jobs would be relocated from the wider regions, such as the North West and South West, to London and the South East as a result of Heathrow expansion.⁵⁴

48 A hub airport is an airport with flights to lots of different places, where people can arrive from one city or country and get flights to other cities or countries. Cambridge Dictionary, [HUB AIRPORT | English meaning - Cambridge Dictionary](#)

49 Department for Transport, [Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England](#), June 2018

50 Regional and Business Airports Group ([AECN0058](#))

51 Productivity compares the level of input with the output. The input may be labour, equipment, or money, and the output may be a good or service. For more information please see: Investopedia, [What Is Productivity and How to Measure It](#)

52 Frontier economics, [HEATHROW EXPANSION BENEFITS](#), 29 January 2025

53 Logistics UK ([AECN0021](#))

54 [Q76](#)

20. In his appearance before the Committee, the then Aviation Minister, Mike Kane MP, said the UK should “sweat the assets we already have”, in line with Government’s “Making Best Use” policy that airports other than Heathrow should maximise flight traffic using current infrastructure.⁵⁵ The Minister accepted that a key aspect for delivering growth to the wider regions is connectivity, primarily the connectivity to London, which comes through Heathrow, the UK’s Hub airport.⁵⁶

21. **CONCLUSION**

We heard concerns that if airport expansion is focused around the South East of England it could concentrate wider growth in those regions. This could be detrimental to the aviation and airport sectors, and the local economy, around the rest of the United Kingdom. Whilst there were representations from regional airports in support of South East expansion, we are concerned that the Government to date has not adequately addressed these former concerns.

22. **RECOMMENDATION**

In response to this report the Government should set out how the planned expansion of London Airports will impact the aviation and airport sector around the rest of the UK and the economic impact and level of growth in the wider regions. We recommend that this analysis should be published before a final decision is made on proposed airport expansion and prior to significant delivery of already agreed expansion to allow appropriate scrutiny.

55 [Q234](#)

56 [Q235](#)

3 Planning considerations

3.1 The Airports National Policy Statement

- 23.** National Policy Statements (NPS) are planning documents that provide the primary basis for making decisions on development consent order applications for ‘nationally significant infrastructure projects’. They set out the need for development, the Government’s policy for meeting that need and detailed planning guidance including the mitigation of scheme impacts.⁵⁷
- 24.** NPS are statutory documents designated by the Government under [section 5 of the Planning Act 2008](#). The Government can designate a draft document as a National Policy Statement only after it has met the consultation and publicity requirements set out in [section 7 of the 2008 Act](#) and the Parliamentary scrutiny requirements as set out in [section 9 of the 2008 Act](#).
- 25.** The Airports National Policy Statement (ANPS) is the policy framework for airport expansion. It is the primary basis for decision-making on development consent applications for a runway at Heathrow Airport, and is an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England.⁵⁸ The current ANPS was published in June 2018 and largely built on the findings of the Airports Commission,⁵⁹ which undertook work to examine the scale and timing of any requirement for additional airport capacity and how this capacity should be met.⁶⁰
- 26.** On 30 January 2025, the Government announced that it would be updating the ANPS.⁶¹ In his appearance before the Committee, David Silk, the Director for Aviation at the Department for Transport, confirmed that this update

⁵⁷ HM Government, [National Network - National Policy Statement FAQs](#)

⁵⁸ Department for Transport, [Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England](#), June 2018

⁵⁹ The Airports Commission was an independent commission established in September 2012 by the then Government to consider how the UK could “maintain its status as an international hub for aviation and immediate actions to improve the use of existing runway capacity in the next 5 years”. For more information on the Airports Commission, please see: [About us - Airports Commission - GOV.UK](#)

⁶⁰ Department for Transport, [Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England](#), paragraph 1.3, June 2018

⁶¹ Department for Transport, [Government update on airport expansion](#), 30 January 2025

to the ANPS would be undertaken only after the Government had received airport expansion proposals.⁶² Additionally, in written evidence to the Committee, the then Aviation Minister, Mike Kane MP, clarified that beyond Heathrow, the existing ANPS will remain a relevant consideration in any airport planning application before the updated ANPS is produced, as is the Making Best Use policy.⁶³

27. The ANPS states that the Making Best Use policy means that airports other than Heathrow must demonstrate sufficient need for their proposal for expansion in which the need is additional to, or different from, the need which is met by the provision of an additional runway at Heathrow.⁶⁴ While Heathrow currently operates at 98% capacity,⁶⁵ evidence to the Committee by Professor Miller, Director of the Whittle Laboratory, highlighted that two thirds of expansion in passenger numbers across the UK will happen with or without airport expansion.⁶⁶
28. Despite the announcement of its intention to update the ANPS, this Government will have made decisions on multiple large expansions, including approving the expansion of Luton Airport in April 2025,⁶⁷ and Gatwick Airport on 22 September 2025.⁶⁸ This raises questions around the strategic planning of the UK's airport system, how it fits with wider Government ambitions and whether decisions are being taken without proper scrutiny and in the absence of the information and data needed to make informed assessments.
29. We heard from a number of witnesses that the current ANPS is outdated and needs updating.⁶⁹ For example, Stay Grounded UK, a coalition aiming to reduce aviation emissions, said

Major airport expansion projects—including Gatwick, Heathrow, and Luton—are being advanced under an outdated policy regime. The ANPS was published before the UK's net-zero commitment and before the publication of the Sixth Carbon Budget. Nevertheless, it continues to shape planning outcomes today.

62 [Q228](#)

63 Department for Transport ([AECN0063](#))

64 Department for Transport, [Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England](#), paragraph 1.42, June 2018

65 Logistics UK ([AECN0021](#))

66 [Q11](#)

67 Planning Inspectorate, [London Luton Airport Expansion development consent decision announced](#), 03 April 2025

68 GOV.UK, [Gatwick Airport Northern Runway development consent decision announced](#), (22 September 2025).

69 No Airport Expansion Campaign Group ([AECN0011](#)), Stay Grounded UK ([AECN0023](#)), Dr Doğuşhan Kılıç (Research Associate at The University of Manchester); Dr Paul Williams (Research Associate at The University of Manchester) ([AECN0028](#)), London Borough of Hillingdon ([AECN0050](#)), Luton Friends of the Earth, in association with Friends of the Earth nationally ([AECN0051](#))

30. Since the publishing of the current ANPS in 2018, the policy landscape has changed significantly. In 2019, the UK committed to delivering Net Zero by 2050.⁷⁰ In July 2022, the Government published its Jet Zero Strategy which sets out the strategy for delivering a decarbonised aviation sector alongside policy measures focused on system efficiencies, Sustainable Aviation Fuels, Zero Emission flight, the use of carbon markets and emissions removals, influencing consumers and addressing non-CO₂; as well as a five year delivery plan.⁷¹ These policy measures will be addressed further in Chapter 4.
31. Also published in 2022, the Flightpath to the Future strategic framework set out the Government's plan for delivering a modern, innovative and efficient aviation sector over the period of 10 years.⁷² Finally, the Government is undertaking work to reduce carbon emissions and make flying more efficient and resilient by modernising how the airspace is controlled and structured. It may also address congestion 'hotspots' and reduce the need for holding stacks, where aircraft join circular queues to land at busy airports.⁷³
32. The ANPS doesn't explicitly account for any of these wider goals and frameworks which are fundamental in providing direction to the sector due to it being produced prior to their publication. However, the Government, the aviation industry and the Planning Inspectorate believe that the current ANPS can sufficiently take account of these policy updates.⁷⁴ Therefore, we welcome the announcement from the Government to update the ANPS.
33. **CONCLUSION**
The Government has confirmed that it is updating the Airports National Policy Statement (ANPS). We welcome the letter from the then Aviation Minister, Mike Kane MP, to the Committee following his appearance which confirmed that the Heathrow decision would not be taken before the new ANPS is published.

70 [The Climate Change Act 2008 \(2050 Target Amendment\) Order 2019](#)

71 Department for Transport, [Jet Zero Strategy](#), 19 July 2022

72 Department for Transport, [Flightpath to the Future](#), 26 May 2022

73 Department for Transport, [Airspace modernisation](#), 22 October 2024

74 Department for Transport ([AECN0032](#)), AirportsUK ([AECN0046](#)), [Q207](#)

34.

CONCLUSION

We are concerned that airport expansion plans will have been produced prior to the publication of a new ANPS which ought to be in place to provide the airports with strategic guidance. We are also deeply concerned that, given a number of airport expansions will have been approved prior to the update (such as Gatwick), the Government is relying on an outdated policy framework which is inconsistent with its objectives and that airport expansion plans will have been based on that outdated framework.

35.

CONCLUSION

The Government should be taking a more strategic approach that should consider wider growth and planning across the whole of the UK. Finally, we are very disappointed that this approach does not allow proper consideration and scrutiny of airport expansion proposals in the light of the new ANPS.

3.2 Secretary of State powers in Development Consent Order approval

36. [Section 104 of the Planning Act 2008](#) provides that the Secretary of State must decide all applications for development consent orders in line with the relevant NPS unless doing so would:

- Lead to the UK being in breach of its international obligations.
- Be unlawful or lead to the Secretary of State being in breach of any duty imposed by or under any legislation.
- Result in adverse impacts of the development outweighing its benefits.
- Be contrary to legislation about how the decisions are to be taken.⁷⁵

In the absence of a relevant national policy statement, the Secretary of State can still decide an application for a Development Consent Order (DCO)⁷⁶ under [section 105 of the Planning Act 2008](#). It provides that the Secretary of State should decide the application in line with matters they consider both “important and relevant” to the decision. In practice, this likely includes the National Planning Policy Framework (NPPF) and the local

75 Section 104, [Planning Act 2008](#)

76 A Development Consent Order is an application made by a project promoter in order to gain consent to undertake a Nationally Significant Infrastructure Project. For more detail on DCOs please see: [Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects - GOV.UK](#)

plan for the area where their Nationally Significant Infrastructure Project (NSIP) would be located.⁷⁷ Where they exist, the Secretary of State can also take into account draft National Policy Statements.⁷⁸

3.3 Environmental considerations in airport planning applications

- 37. Further discussion on mitigating the climate and environment impacts of airport expansion can be found in Chapter 4.
- 38. Research undertaken by think tanks ODI and Transport & Environment in 2024⁷⁹ found that London was the city most affected by air pollution from aviation compared to others around the world. Its six airports generated the same amount of air pollution as 3.23 million cars.⁸⁰ Despite this, a large proportion of the proposed airport expansion is in and around London. Five of the six London-serving airports have plans for expansion including Heathrow, Gatwick, Luton, London City and Stansted.
- 39. The ANPS has received criticism for its lack of consideration of environmental impacts. The Planning Inspectorate, when reviewing applications for airport expansion, assesses the environmental impact of expansion across a number of categories set out in the ANPS such as carbon emissions, air quality and noise.⁸¹ It then uses this assessment to judge an application's merits and determine whether the benefits outweigh the detrimental impacts. It has, on occasion, suggested changes and additional controls to the DCO that must be in place to mitigate negative environmental impacts should the development go ahead.⁸²

77 House of Commons Library, [Planning for nationally significant infrastructure projects \(NSIPs\)](#), 8 July 2024

78 House of Commons Library, [Planning for nationally significant infrastructure projects \(NSIPs\)](#), 8 July 2024

79 Tracker - Airport Tracker

80 Heathrow, Schiphol, Charles de Gaulle: European airports rank amongst the world's most polluting, Euronews, 28 February 2024

81 For more information please see: Department for Transport, [Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England](#), June 2018

82 Planning Inspectorate, [Gatwick Airport Northern Runway Project](#), 27 February 2025

3.2.1 Air pollution

40. Evidence to the Committee highlights that, despite the [Environment Act 2021](#) introducing legally binding targets,⁸³ and the Government committing that any airport expansion would have to be compatible with both climate and environment targets,⁸⁴ concerns about air pollution remain. The current ANPS sets out that planning permissions for a third Heathrow runway would require the project to demonstrate compliance with legal air quality obligations.⁸⁵
41. Clean Air in London, a campaign group, told the Committee that the modelling of the air quality impacts of Heathrow expansion which informed the current ANPS shows expansion before 2030 would bring a high risk of non-compliance with air quality limits. They further found that the benefits to air quality in London provided by the capital's Ultra-Low Emission Zone (ULEZ) could be wiped out through Heathrow expansion alone.⁸⁶ Such pollution would have concentrated effects on specific local communities. For example, the London Atmospheric Emissions Inventory⁸⁷ estimated that by 2030, aviation will account for 40% of Nitrogen Oxide pollution across the borough of Richmond, which neighbours Heathrow.⁸⁸
42. The current ANPS does not explicitly state that any airport expansion, aside from Heathrow, would be prevented unless it can demonstrate compliance with legal air quality obligations. Instead, expansion decisions are judged against the National Planning Policy Framework. That states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.⁸⁹

83 Dr Lois Pennington (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester); Professor Alice Larkin (Professor of Climate Science and Energy Policy at The Tyndall Centre for Climate Change Research, The University of Manchester); Dr Gaurav Gharde (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester) ([AECN0027](#))

84 Department for Transport, [Transport and growth update: airport expansion and transition to greener aviation](#), 29 January 2025

85 Department for Transport ([AECN0032](#))

86 Clean Air in London ([AECN0042](#))

87 The London Atmospheric Emissions Inventory is the key tool for air quality analysis and policy development in London. It is a regularly updated database of pollutant emissions and sources including geographically referenced data and maps. For more information, please see: [Air Quality Data – London Datastore](#)

88 Jeremy Rodell ([AECN0009](#))

89 Department for Transport ([AECN0032](#))

43. Furthermore, the World Health Organisation (WHO) clean air targets are more stringent than those set out in the UK, meaning that even if airport expansion does not cause air pollution to exceed the UK legal level, it does not mean this is a safe level by international standards.⁹⁰
44. Air pollution levels have improved around some airports. For example, air quality around Heathrow has been improving to levels matching or below UK Air Quality Standards.⁹¹ These improvements in air quality around Heathrow have largely come from cleaner aircraft and cleaner road vehicles.⁹² For example, Matthew Gorman, Director of Carbon Strategy, Heathrow, told us that the airport has had a continuous monitor right next to one of its runways since the early 1990s, which had shown that pollution limits were being met that was “evidence that planes have become a lot cleaner”.⁹³ Airports should be incentivised to use modern planes that have the latest technology and fuel efficiency to reduce emissions that damage air quality around airports.
45. There are also a number of emerging technologies that could further reduce the levels of non-CO₂ pollutants, such as nitrous oxides, carbon monoxide and particulate matter. For example, engines that use lean burn and Advanced RQL (Rich burn Quick quench Lean) combustors have the potential to reduce such emissions by 40%.⁹⁴ There is also future potential to inject atomized water droplets for cooling the engine airflow during take-off to reduce emissions, which could reduce emissions by up to 50%.⁹⁵ Such technologies should be supported and airlines that use them, when they are fully operational, should be incentivised to implement them across their fleets to reduce such pollutants and improve air quality around UK airports.
46. As previously noted, the Government has stated that it will not go ahead with airport expansion if it will negatively impact on air quality. When appearing before the Committee, the then Aviation Minister, Mike Kane MP, confirmed that he would not be interested in airport expansion if it increased air pollution.⁹⁶ However, Ian Thynne, Head of Environmental Planning Specialists at Hillingdon Council, the borough which contains

90 Richmond Heathrow Campaign ([AECN0044](#)), Aviation Environment Federation (AEF) ([AECN0045](#))

91 Richmond Heathrow Campaign ([AECN0044](#))

92 Heathrow Airport Limited ([AECN039](#))

93 Q156

94 IATA, [Non-CO2 Aviation Emissions](#), (accessed 7 October 2025).

95 See above and X. Liu et al., [Review of modern low emissions combustion technologies for aero gas turbine engines](#), Progress in Aerospace Sciences, (October 2017), vol. 94, pp 12–45.

96 Q239

most of Heathrow, highlighted to us that though the economic benefits of expansion were unknown, the negative effects on air quality were more certain.⁹⁷ Other witnesses supported this view.⁹⁸

47. Another concern about airport expansion is that such an increase in passenger numbers will increase road traffic and therefore further increase pollution. This is a clear driver in poor air quality, with road traffic being the main contributor to air pollution around Heathrow.⁹⁹ This has been recognised by the Secretary of State for Transport. For example, in her “minded to grant consent” letter for Gatwick,¹⁰⁰ the Secretary of State included a requirement to have 54% of passengers using public transport prior to bringing the Northern Runway into operation. However, Gatwick stated that it needed the Department for Transport to support the delivery of the 54% target including through reinstating the full Gatwick Express train service.¹⁰¹
48. Appearing before the Committee, Paul Beckford, Policy Director for the No 3rd Runway Coalition, highlighted the greater need for public transport options around airports in order to mitigate the impacts of air pollution around local communities.¹⁰² He highlighted analysis undertaken by TfL which showed that any Heathrow expansion would result in between 100,000 and 200,000 increased trips which would increase congestion and air pollution through engine idling.¹⁰³ Greater rail links to airports, both from London and the rest of the UK to Heathrow would require significant public investment which is yet to be announced.¹⁰⁴

49. **CONCLUSION**

Whilst air pollution around Heathrow has reduced in recent years due to cleaner aircraft and road vehicles, airport expansion will make it harder for Governments, both national and local, to deliver on air quality targets. The Airports National Policy Statement fails to sufficiently account for the impact airport expansion will have on air pollution.

97 Q206

98 Possible ([AECN0014](#)), Gatwick Area Conservation Campaign ([AECN0043](#))

99 [Q156](#)

100 Department for Transport, [Letter on behalf of Secretary of State setting out the response to the Gatwick DCO](#), 27 February 2025

101 London Gatwick, [London Gatwick responds to Secretary of State on Northern Runway planning application](#), 25 April 2025

102 Q51

103 Q51

104 Q53

50.

RECOMMENDATION

The Government, when updating the Airports National Policy Statement, should impose air quality limits for areas surrounding airports covering all key air quality pollutants such as nitrogen oxides and particulate matter. Having established those limits, government should require that any airport expansion is accompanied by measures to ensure no consequential net increase in air pollution including mitigating against the impact of road traffic growth surrounding airports. In response to this report, the Government must set out what measures it will put in place, including the level of pollution it deems acceptable, and how it will ensure they are met.

51.

RECOMMENDATION

The Government should set out in its response to this report what work and research it is supporting to reduce non-CO2 emissions that damage air quality around airports. It should also confirm whether it has identified which current aircraft have the least impact on air quality around airports. We recommend that the Government should consider incentivising airlines to utilise airplanes that use technology or techniques that reduce such emissions. This should include consulting the aviation industry within six months of this report on the feasibility of reducing the age of the fleet.

3.2.2 Noise pollution

52.

Noise pollution is a significant consequence of current airport activity. For example, Teddington Action Group told us that Heathrow already adversely affects more residents with noise than Frankfurt, Madrid, Paris and Amsterdam airports combined.¹⁰⁵ Over 2.5 million people in the UK are extremely disturbed by aircraft noise, with 31% of the population affected to some extent.¹⁰⁶ Noise pollution can have significant impacts on those people who live around airports. For example, frequent noise not only affects quality of life, but causes headaches and serious ill-health while being woken up by a plane increases the chance of stroke or heart disease.¹⁰⁷

53.

The Government's overarching aviation noise policy statement, was published in March 2023.¹⁰⁸ It states that the overall policy is to balance the economic and consumer benefits of aviation against their social and health

105 Teddington Action Group ([AECN0006](#))

106 UK Noise Association ([AECN0001](#))

107 Luton Friends of the Earth, in association with Friends of the Earth nationally ([AECN0051](#)); Dr Charlotte Clark, [Aircraft noise effects on health](#), May 2015; [UK Civil Aviation Authority, Aircraft Noise and Health Effects: a six-month update](#), 2023

108 Department for Transport, [Overarching aviation noise policy](#), 27 march 2023

implications with the impact of aviation noise being mitigated as much as is practicable and realistic to do so.¹⁰⁹ While some predict that airport expansion will make this worse,¹¹⁰ there are claims that expansion will only go ahead if it can do so within current noise rules¹¹¹ and the Government has stated any expansion plans must show that they can comply with strict environmental requirements on noise pollution.¹¹²

54. While the impact of noise pollution is considered as part of the Development Consent Order planning process, there are no associated statutory or non-statutory obligations. However, the policy does set general requirements regarding how the effects arising from aviation noise are to be managed.¹¹³
55. The Government's plan to modernise flight paths is an opportunity to minimise the impact of noise on small groups of communities. The UK Noise Association, a campaign group, told us that people are largely concerned with the number of flights overhead rather than the noise of individual flights, which means that spreading the noise impacts of an airport over a larger area may be preferable.¹¹⁴ Though some of our witnesses suggested that airspace modernisation might reduce noise exposure for many communities,¹¹⁵ Teddington Action Group contended modernisation of flight paths could increase the intensity of current flights and therefore increase noise pollution.¹¹⁶
56. We heard that technology might address some of the issues around noise pollution. Manchester Airports Group stated that over the past 50 years, aircraft have become significantly quieter, with noise levels falling by around 75% thanks to major advances in engine and airframe technology.¹¹⁷ Sustainable Aviation, a body which brings together UK airlines, airports, manufacturers and other aspects of the aviation industry, predicts that by 2035, noise pollution from aviation will be 35% lower than in 2019, even as the aviation sector grows.¹¹⁸ Continued innovation has the potential to

109 As above. See also Institute of Acoustics ([AECN0026](#))

110 Munira Wilson (Member of Parliament) ([AECN0012](#)), Bristol Airport Action Network ([AECN0010](#)), Possible ([AECN0014](#))

111 Thames Valley Chamber of Commerce & Industry ([AECN0022](#)), Logistics UK ([AECN0021](#))

112 Department for Transport ([AECN0032](#))

113 As above. See also Institute of Acoustics ([AECN0026](#))

114 UK Noise Association ([AECN0001](#))

115 Manchester Airports Group (MAG) ([AECN0054](#))

116 Stephen Clark and David Gilbert (both members of TAG (community organisation) at Teddington Action Group (TAG)); Clark and Gilbert ([AECN0007](#))

117 Manchester Airports Group (MAG) ([AECN0054](#))

118 Sustainable Aviation ([AECN0052](#))

deliver further noise reduction, alongside the optimisation of flightpaths, sharing operational best practice¹¹⁹ and grants to support noise insulation for those most impacted.¹²⁰

57. One of the main ways the impact of noise pollution on local communities is mitigated is through the funding of noise insulation on homes, schools and hospitals. The [Aviation Policy Framework 2013](#), set out the Government's expectation for noise insulation and compensation. In 2017, this was updated to provide an increased expectation regarding noise insulation, removing the requirement for a minimum change in noise level, as well as exceeding a noise level threshold, to trigger an insulation provision.¹²¹ The London Borough of Hillingdon told us, however, that the noise level at which insulation is provided to households remains too high.¹²²

58. **CONCLUSION**

The Airports National Policy Statement fails to account for noise pollution. Whilst improvements have been seen in reducing the level of noise made by individual flights, more must be done to minimise the impact on those who live under and around flight paths.

59. **RECOMMENDATION**

The Government should ensure that it is actively working to minimise and mitigate all impacts of noise pollution on relevant populations caused through flying. It should also include a target, within the new ANPS, on the level of acceptable noise from flights both individually and cumulatively. The Government should set out this target in the response to this report.

60. **CONCLUSION**

We understand the need for the Government to modernise the airspace around the UK, particularly if this will minimise the queuing of planes at airports and reduce the time planes spend circling before they can land. However, this work is likely to expand the area covered by flight paths and thereby increase the number of people directly impacted by noise from flying.

119 Manchester Airports Group (MAG) ([AECN0054](#))

120 London Borough of Hillingdon ([AECN0050](#))

121 Institute of Acoustics ([AECN0026](#))

122 London Borough of Hillingdon ([AECN0050](#))

61.

RECOMMENDATION

The Government must publish an impact assessment of its airspace modernisation work in regard to how it will change noise impacts as well as publish a map which allows people to see where the noise of aircraft is likely to exceed the World Health Organisation (WHO) recommended levels. Where this work introduces noise pollution to new areas, the Government must expand its mitigation work including the requirement of industry funding for measures to decrease the impact on the population who live in the areas affected, such as improved sound insulation. This should be done alongside publication of the updated ANPS so that it can inform scrutiny of the Government's proposals. We also express concern about the impact on biodiversity. The Government should undertake an impact assessment on the impact on biodiversity and put mitigations in place.

3.2.3 Cumulative impacts

62. A number of submissions to the Committee highlighted that the current system for assessing airport expansion proposals fails to take account of the cumulative impacts of parallel projects on the UK's climate and environment targets.¹²³ This is a fundamental gap in the current ANPS.
63. We found substantial support for the new ANPS to require a cumulative impact assessment, taking account of climate and environment impacts across the whole of the UK, before the Government can agree any airport expansion.¹²⁴
64. For example, Dr Pauleen Lane CBE, Professional Lead for Infrastructure at the Planning Inspectorate, informed us that an updated ANPS would have to demonstrate how it is compliant with the sector's overall contribution to reducing the UK's carbon emissions. Given the stage several airport expansion proposals had reached, she argued that the Government should have the data and information to undertake cumulative analysis.¹²⁵

123 Possible ([AECN0014](#)), Stay Grounded UK ([AECN0023](#))

124 Bristol Airport Action Network ([AECN0010](#)), No Airport Expansion Campaign Group, 26 other campaigning groups and NGOs working in the area of aviation growth ([AECN0011](#)), Possible ([AECN0014](#)), Janet Grimes ([AECN0016](#)), Bristol Green Party Councillor Group ([AECN0017](#)), Stay Grounded UK ([AECN0023](#)), Dr Doğuşhan Kılıç (Research Associate at The University of Manchester); Dr Paul Williams (Research Associate at The University of Manchester) ([AECN0028](#)), No 3rd Runway Coalition ([AECN0033](#)), Mrs Jackie Head ([AECN0034](#)), Safe Landing ([AECN0038](#)), Aviation Environment Federation (AEF) ([AECN0045](#)), Luton Friends of the Earth ([AECN0051](#))

125 Qq204–205

3.2.4 Legal challenges

65. In recent years, Government decisions that are relevant to airports have been challenged in the courts for a failure to adequately meet climate and environmental obligations.
66. In July 2022, the High Court ruled that elements of the Net Zero Strategy were unlawful and ordered the Government to produce a strategy that complied with its obligations under section 14 of the [Climate Change Act 2008](#) to report on proposals and policies for meeting carbon budgets.¹²⁶
67. Subsequently, following the publication of the Carbon Budget Delivery Plan, the Government was again challenged in the courts in 2023 for decisions made in that Plan. In May 2024, the High Court again ruled that the Government plan was unlawful and ordered the Government to produce a new Carbon Budget Delivery Plan within 12 months,¹²⁷ a deadline subsequently extended to October 2025.¹²⁸ Any airport expansion proposals must be deliverable within the current carbon budgets and consistent with meeting net zero by 2050.

68. **CONCLUSION**

The Airports National Policy Statement (ANPS) is not fit for purpose and requires updating to reflect Government policy. The ANPS specifically fails to:

- Provide an integrated view on the role of the aviation and airport system across the country as a whole,
- Provide information on environmental limits including air pollution limits, noise limits and greenhouse gas emissions,
- Set out how cumulative impacts from all current UK airports and future airport expansion should be accounted for in the planning process.

This leads to environmental risks and leaves future expansion applications open to legal challenges, slowing progress of any airport expansion.

126 R v Secretary of State for Business, Energy and Industrial Strategy [2022] EWHC 1841 (Admin)

127 R v Secretary of State for Energy Security and Net Zero [2024] EWHC 995 (Admin)

128 Friends of the Earth, [Govt to publish new climate action plan in October](#), 25 March 2025

69.

RECOMMENDATION

The Government should update the Airports National Policy Statement no later than six months after the publication of this report. The updated Statement should:

- set out a coherent plan from Government about the airport and aviation system that takes into account wider innovations such as flight path modernisation and airport capacity around the whole of the UK,
- include specific, measurable limits for key aspects of air pollution, noise pollution and greenhouse gas emissions,
- set out how the Development Consent Order process will account for cumulative environmental impacts from airports across a wide area to provide a holistic picture of the aviation system and ensure that all parallel airport expansion is sustainable.

4 Plans to mitigate environmental impacts of airport expansion

4.1 The impact of expansion on climate change

- 70.** In 2019 the Government committed to achieving net zero by 2050.¹²⁹ The Climate Change Committee (CCC) state that to deliver on this ambition the aviation sector must deliver emissions savings through demand management as well as deployment of Sustainable Aviation Fuel (SAF), efficiency gains and carbon offsetting.¹³⁰ However, Sustainable Aviation told us that the sector believes that it can deliver emissions savings without needing demand management measures.¹³¹
- 71.** The Government aims to reduce aviation emissions through a number of mechanisms: the use of Sustainable Aviation Fuel, improvements in aviation efficiency, the development of zero carbon aircraft and emissions trading and offsetting. As noted, it does not include demand management as a tool to reduce emissions.
- 72.** As previously mentioned, the Climate Change Committee has stated that the aviation sector is projected to be the largest polluter in the UK by 2040,¹³² and if current trends continue, the sector may pose a risk to the UK's carbon emissions targets.¹³³
- 73.** Vital to ensuring that emissions from aviation are correctly considered within the UK net zero targets is the formal inclusion of the UK's share of international aviation emissions within the UK's Carbon Budgets. The Climate Change Committee (CCC) has included international aviation emissions from the Sixth Carbon Budget onwards. In the Seventh Carbon

129 [The Climate Change Act 2008 \(2050 Target Amendment\) Order 2019](#)

130 Climate Change Committee, [Progress in reducing emissions 2025 report to Parliament](#), June 2025

131 Sustainable Aviation ([AECN0052](#))

132 Climate Change Committee, [Seventh Carbon Budget](#), February 2025

133 Climate Change Committee, [Progress in reducing emissions 2025 report to Parliament](#), June 2025.

Budget, the CCC stated that this was “important as reducing both territorial and international emissions is vital to limit global warming”.¹³⁴ Johann Beckford, Senior Policy Advisor at Green Alliance, told us:

There is a clear moral as well as environmental case for them being included Well over 90% of aviation emission impacts from a CO₂ perspective are international and so, if we were to suddenly ignore international aviation, we would essentially not be telling the truth about the right impact levels that we need to consider.¹³⁵

74. However, he also noted that though the CCC was now including this in their Carbon Budgets, there was a ‘wrinkle’ in that Government still needed to formally legislate for international aviation and shipping emissions to be included in the Climate Change Act targets. This was despite the previous Government making this commitment in June 2021.¹³⁶ Mr Beckford suggested that this could be “easily enough done via secondary legislation” if the Government could allocate the time.¹³⁷ This echoed the CCC’s recommendation in the Seventh Carbon Budget, that it was “critical” that the Government made the necessary regulations under Section 30 of the Climate Change Act 2008 to formally include international aviation emissions in carbon budgets and the Net Zero target.¹³⁸ It also reflected our predecessor Committee’s recommendation in its report—Net zero and the UK aviation sector—published in December 2023,¹³⁹ which the previous Government agreed to do at the earliest opportunity, subject to Parliamentary scheduling in its response, but did not enact.¹⁴⁰
75. Beyond carbon emissions, non-CO₂ emissions could contribute to half of the overall climate impact of aviation.¹⁴¹ This is largely due to the clouds that are formed, known as contrails.¹⁴² Persistent contrails are long-lasting condensation trails formed by aircraft at high altitudes, which can spread

134 CCC, The Seventh Carbon Budget, (February 2025), para 3.1.3.

135 [Q6](#)

136 Climate Change Committee, [Progress in reducing emissions: 2023 Report to Parliament](#), June 2023, pp. 282 and 402.

137 As above.

138 CCC, The Seventh Carbon Budget, (February 2025), para 3.1.3.

139 EAC, [Net zero and the UK aviation sector](#), (HC 404; December 2023), p 19.

140 EAC, [Net zero and the UK aviation sector: Government Response to the Committee’s Third Report](#), (HC 622; April 2024).

141 Non-CO₂ emissions include water vapour, nitrogen oxides, sulphur oxides, carbon monoxide, particulate matter, contrails and other examples. More details can be found at: [IATA Non-CO₂ emissions FAQ](#)

142 [Q2](#), Dr Lois Pennington (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester); Professor Alice Larkin (Professor of Climate Science and Energy Policy at The Tyndall Centre for Climate Change Research, The University of Manchester); Dr Gaurav Gharde (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester) ([AECN0027](#)), International Air Transport Association, [Aviation contrails and their climate effect](#), 30 April 2024

into cirrus-like clouds and contribute to atmospheric warming by trapping heat.¹⁴³ This cloud formation can be avoided by altering aircraft altitude.¹⁴⁴ Despite the warming impact of these emissions, they are excluded from current climate calculations.¹⁴⁵

- 76.** In our visit to the Aviation Impact Accelerator (AIA), the Committee gained insight into the nature of contrails and saw first hand how the creation of contrails can be addressed by avoiding certain specific environmental conditions. This can be done through a number of procedures, such as small adjustments to flight paths, notably minor climbs or descents, to avoid those cold and humid atmospheric areas where contrails form.¹⁴⁶ They could also be partially reduced by the use of SAF and engines with tailored combustion engines that emit less soot.¹⁴⁷ The Aerospace Technology Institute notes that the work carried out by the AIA and others could be deployed at scale by the UK as early as 2030 if there is considerable preparation and coordination by the Government between airlines, air traffic controllers (e.g. NATS in the UK), academia and providers of the necessary imaging and data analysis technology.¹⁴⁸
- 77.** In his appearance before the Committee, the then Aviation Minister, Mike Kane MP, acknowledged the importance of non-CO₂ effects but noted that the Government does not know enough about it and has therefore dedicated £29 million to a research and development programme.¹⁴⁹
- 78.** In the previous Parliament, the predecessor Committee highlighted that the Government acknowledged the contribution of non-CO₂ effects from aviation and is examining methods of mitigating such impacts. The Committee recommended that any strategy to reduce the impact of UK aviation activity on global warming ought to encompass the environmental effects of aviation in their entirety.¹⁵⁰

143 Aviation Impact Accelerator ([AECN0057](#))

144 [Q27](#)

145 Stay Grounded UK ([AECN0023](#)), Richmond Heathrow Campaign ([AECN0044](#))

146 See for example: Transport and Environment, [Contrail avoidance is cost effective and brings huge climate benefits](#), (November 2024);

147 See: Royal Aeronautical Society, [CONTRAILS AND CONTRAIL MANAGEMENT](#), (April 2023).

148 Aerospace Technology Institute, [How can the UK lead the way on contrail avoidance?](#), (9 June 2025). See also: Georgis A Keledis et al., Towards elimination of Soot Emissions from Jet Fuel Combustion, *Environmental Science Technology*, vol 57, no 28, (July 2023), pp 10276–10283.

149 [Q242](#)

150 Environmental Audit Committee, [Net zero and the UK aviation sector](#), 18 December 2023

- 79. CONCLUSION**
Whilst the Committee understands the Government position that it includes international aviation emissions within its carbon calculations, the UK is yet to formally legislate to include international aviation emissions within the Carbon Budgets, despite it agreeing to do so previously.
- 80. RECOMMENDATION**
We reiterate the recommendation made by the Climate Change Committee, our predecessor Committee and others that the Government makes Parliamentary time available to introduce the necessary legislation to formally include international aviation emissions within Carbon Budgets and its Net Zero targets. The Government should do this within the current Parliamentary session.
- 81. CONCLUSION**
Whilst a reduction in aviation emissions is necessary to deliver a net zero aviation sector, an important contribution to the UK's efforts is the reduction of non-CO₂ effects, such as contrails.
- 82. RECOMMENDATION**
Within six months of the publication of this report the Government must consult on airspace-wide contrail avoidance measures. Furthermore, given the significant role that non-CO₂ effects play in global warming, the Government must account for these in its assessment of the overall impact of the aviation sector.

4.2 Methods to reduce the climate impact of aviation

4.2.1 Sustainable Aviation Fuel

- 83.** Sustainable Aviation Fuel (SAF) can be produced from a number of sources, or “feedstocks”:
- Waste oils, which are often termed Hydrotreated Esters and Fatty Acids (HEFA) - first generation SAF,
 - Municipal waste and non-food crops - second generation SAF,

- Hydrocarbons produced through the combination of captured carbon and green hydrogen (Power-to-Liquid, PtL) - third generation SAF.¹⁵¹

- 84.** To drive the production and use of SAF, the Government introduced two key mechanisms: the SAF Mandate and a Revenue Certainty Mechanism (RCM). The SAF Mandate introduced a legal obligation on fuel suppliers to the UK to provide increasing proportions of SAF to airWHOlines. The main obligation requires 2% of fuel to be SAF in 2025, increasing to 10% by 2030 and 22% by 2040. It also requires, from 2028, 0.2% of jet fuel to be PtL, increasing to 3.5% by 2040.¹⁵²¹⁵³ In order to encourage commercial-scale SAF plants to begin business in the UK, the Government sought to give investors confidence in future business revenue by introducing the RCM, which guarantees a minimum price for SAF.¹⁵⁴¹⁵⁵¹⁵⁶
- 85.** SAF can deliver emissions savings compared to traditional kerosene jet fuel. The Government claims that SAF would deliver 70% greenhouse gas emissions savings if it fully replaced kerosene.¹⁵⁷ However, different feedstocks provide varying levels of emissions savings, with a minimum level of 40% as set out under the SAF Mandate.¹⁵⁸
- 86.** The reliance on SAF to deliver such a significant level of emissions reductions has come under criticism, largely due to the shortage of feedstocks to produce the quantities of SAF required.¹⁵⁹ For example, the Group for Action on Leeds Bradford Airport told us: “the quantity of genuinely sustainable biomass feedstocks is strictly limited. It is highly unlikely that biofuel can

151 House of Commons Library, [Sustainable Aviation Fuel Bill 2024–25](#), 9 June 2025

152 Department for Transport, [The SAF Mandate: an essential guide](#), 19 December 2024

153 For more information on the SAF mandate, please see: [The SAF Mandate: an essential guide - GOV.UK](#)

154 The strike price is a guaranteed price for SAF. If the SAF producer sells the fuel below this price then the Government counterparty shall pay the producer. If the fuel producer sells above this price then the producer must pay the different between the strike price and selling price to the counterparty.

155 House of Commons Library, [Sustainable Aviation Fuel Bill 2024–25](#), 9 June 2025

156 For more information on the SAF Revenue Certainty Mechanism, please see: [Sustainable Aviation Fuel Bill 2024–25](#)

157 Department for Transport, [Sustainable aviation fuel revenue certainty mechanism: approach to industry funding](#), 14 May 2025

158 Department for Transport, [The SAF Mandate: an essential guide](#), 19 December 2024

159 Group for Action on Leeds Bradford Airport (GALBA) ([AECN0008](#)), Stay Grounded UK ([AECN0023](#)), Dr Lois Pennington (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester); Professor Alice Larkin (Professor of Climate Science and Energy Policy at The Tyndall Centre for Climate Change Research, The University of Manchester); Dr Gaurav Gharde (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester) ([AECN0027](#)), Dr Doğuşhan Kılıç (Research Associate at The University of Manchester); Dr Paul Williams (Research Associate at The University of Manchester) ([AECN0028](#)),

be scaled up to more than a small fraction of aviation fuel consumption by 2050 without damaging impacts on land use and other, arguably more important, sectors.”¹⁶⁰

87. The Royal Society estimated that for the UK to replace the 12.3 million tonnes of jet fuel used every year with a biofuel alternative, would require more than 50% of the land currently used in the UK for agriculture.¹⁶¹ It also highlighted that the use of waste cooking oil could provide between just 0.3% and 0.6% of annual aviation fuel use in the UK. Municipal waste could provide up to 10%, but availability for use as fuel is dependent on waste being produced and collected.¹⁶² Additionally, the production of green hydrogen for PtL SAF would require significant levels of renewable energy if this in itself did not lead to emissions. The Royal Society have estimated that 2.4 to 3.4 times the total current renewable electricity in the UK would be required for total fuel replacement to be emissions neutral.¹⁶³
88. The then Aviation Minister, Mike Kane MP, made clear to the Committee that his confidence in SAF to deliver the required emissions reductions stems from the SAF Mandate and the Revenue Certainty Mechanism.¹⁶⁴
89. SAF currently asks a higher price than conventional kerosine jet fuel, though the aviation industry does not pay tax on its fuel which keeps conventional kerosine fuel prices low.¹⁶⁵ While the aviation industry agrees achieving price parity between kerosine and SAF would incentivise uptake, it disagrees with taxing kerosine fuel to incentivise a greater uptake of SAF, but to instead focus on taxing carbon.¹⁶⁶ Other stakeholders argued that a taxation of kerosine would align with the ‘polluter pays’ principle¹⁶⁷ and assist in reducing aviation emissions.¹⁶⁸

160 Group for Action on Leeds Bradford Airport (GALBA) ([AECN0008](#))

161 The Royal Society, [Net zero aviation fuels: resource requirements and environmental impacts](#), February 2023

162 The Royal Society, [Net zero aviation fuels: resource requirements and environmental impacts](#), February 2023

163 The Royal Society, [Net zero aviation fuels: resource requirements and environmental impacts](#), February 2023

164 [Q261](#)

165 Bristol Airport Action Network ([AECN0010](#))

166 [Q161](#)

167 The ‘polluter pays’ principle is the commonly accepted practice that those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment. For more information, please see: [What is the polluter pays principle?](#)

168 Possible ([AECN0014](#)), Opportunity Green ([AECN0024](#)), Dr Lois Pennington (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester); Professor Alice Larkin (Professor of Climate Science and Energy Policy at The Tyndall Centre for Climate Change Research, The University of Manchester); Dr Gaurav Gharde (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester) ([AECN0027](#)), Richmond Heathrow Campaign ([AECN0044](#)), Bristol Airport Action Network ([AECN0010](#))

90. Evidence heard at the Whittle Laboratory suggested that whilst moving 25% of fuel usage to sustainable aviation fuel would offer substantial emissions reductions, beyond that point the reductions became much less certain. This is due to the likelihood of reducing availability of feedstocks for other sectors and moving beyond utilising ‘waste’ products and towards having to grow and cut down crops purely to serve the aviation sector. They suggested that other new technologies such as battery and hydrogen powered aircraft would also need to make up a proportion of the emission reductions in the future and warned against relying too heavily upon SAF to reduce aviation emissions.
91. It is clear that the UK would not be able to produce sufficient Sustainable Aviation Fuel to service the level of SAF the Government currently expects the industry to use. The Committee is concerned that current Carbon Budgets would not recognise imported SAF as being a genuine reduction in emission which would leave a gap in current Government carbon accounting.

4.2.2 Emissions trading and offsetting

92. In order to deliver on net zero in the aviation sector, a certain level of emissions will need to be removed from the environment or offset through emissions trading schemes.¹⁶⁹ The Jet Zero Strategy committed residual emissions in 2050 to be offset or removed.¹⁷⁰ The two main methods the UK aviation sector uses to trade its excess emissions are the Emissions Trading Scheme (ETS)¹⁷¹ and the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).¹⁷²

169 For an explainer on emission emissions trading schemes, please see: [How do emissions trading systems work? - Grantham Research Institute on climate change and the environment](#)

170 Department for Transport, [Jet Zero Strategy](#), July 2022

171 Department for Energy Security and Net Zero, [UK Emissions Trading Scheme markets](#), 25 October 2024

172 International Civil Aviation Organisation, [Carbon Offsetting and Reduction Scheme for International Aviation \(CORSIA\)](#)

Box 3: CORSIA and ETS

1. The **Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)** is the first global market-based scheme that applies to a specific sector. It complements other aviation in-sector emissions reduction efforts such as technological innovations, operational improvements and sustainable aviation fuels to meet the International Civil Aviation Organisation aspirational goal of carbon neutral growth.¹⁷³ CORSIA requires aeroplane operators to offset the growth in international aviation emissions above a baseline set at 85% of 2019 emissions levels.¹⁷⁴
2. The **UK Emissions Trading Scheme (ETS)** currently covers the heavy industry, power and aviation sectors – approximately 25% of UK territorial emissions. The scheme incentivises investment in decarbonisation in line with climate targets across the UK, by setting a cap on emissions from these sectors and creating a carbon price.¹⁷⁵ Carbon pricing seeks to apply a cost to activities like fossil fuel power generation, manufacturing and air travel that better reflects the cost to society of the emissions they produce.¹⁷⁶ Each year, operators who are covered by the scheme must surrender UK ETS Allowances (UKAs) to cover their emissions for that year. To do so, they must acquire allowances through auctions, from other participants through secondary markets, or they can obtain UKAs from their free allocation (if eligible).¹⁷⁷

93. The Government argues that carbon pricing schemes such as the UK ETS and CORSIA incentivise cost-effective and technology-agnostic emissions reductions in the aviation sector, making the uptake of lower and zero emission technologies more economically attractive.¹⁷⁸ The International Air Transport Association, a trade association for 350 airlines and 80% of global air traffic,¹⁷⁹ told the Committee that CORSIA signatories, including the UK, expressly rejected levies or taxes as an effective means to address carbon emissions from aviation.¹⁸⁰

173 International Civil Aviation Organization, [Carbon Offsetting and Reduction Scheme for International Aviation \(CORSIA\)](#), accessed August 2025

174 Environment Agency, [CORSIA: how to comply](#), 12 April 2024

175 Department for Energy Security and Net Zero, [UK Emissions Trading Scheme \(UK ETS\): policy overview](#), 29 August 2025

176 Department for Energy Security and Net Zero, [UK Emissions Trading Scheme \(UK ETS\): policy overview](#), 29 August 2025

177 Department for Energy Security and Net Zero, [UK Emissions Trading Scheme \(UK ETS\): policy overview](#), 29 August 2025

178 Department for Transport ([AECN0032](#))

179 IATA, [IATA - About Us](#)

180 IATA ([AECN0035](#))

94. We have received evidence criticising these schemes. While the two schemes are complementary, they have limited stringency.¹⁸¹ The ETS only covers flights to European destinations and therefore—as Dr Alex Chapman, Senior Economist at the New Economics Foundation told us—flights outside of Europe are essentially not paying tax on carbon, incentivising people to fly greater distances per flight and in turn increasing emissions per flight.¹⁸²
95. While CORSIA covers international flights to and from non-European destinations it is not a ‘cap and trade’ scheme¹⁸³ and therefore does not limit emissions. Furthermore, it has been criticised for not pricing carbon high enough to sufficiently impact emissions growth.¹⁸⁴ This is demonstrated by the carbon price being significantly lower than projected in the Jet Zero Strategy. The Department for Transport has assumed in its Jet Zero modelling an ETS price of £82 per tonne in 2024, rising to £150 by 2030; the current price is around £40 per tonne.¹⁸⁵ The scenario used in the Jet Zero Strategy relies on carbon prices rising rapidly and pricing on non-European flights being introduced, through the Emissions Trading Scheme (ETS), to deliver the largest share of carbon savings in the sector.

4.2.3 Demand Management

96. The most significant driver of UK aviation emissions has been rising demand. Between 1990 and 2023, the number of international flight passengers increased by 208% while domestic flight passengers increased by 38%.¹⁸⁶ Demand management, in aviation terms, refers to limiting the scale of growth of passenger numbers.
97. While the CCC does not assume any demand management for domestic flights to or from Northern Ireland or the Scottish Islands, it states that demand management for international aviation will play an important role in decarbonising the sector, particularly in the 2020s and 2030s while SAF and technology rollouts progress.¹⁸⁷ The CCC estimates that aviation demand can still increase by 28% by 2050 compared to 2025 levels without a significant impact on emissions if deployment of other emissions savings methods remain on track.¹⁸⁸

181 Dr Doğuşhan Kılıç (Research Associate at The University of Manchester); Dr Paul Williams (Research Associate at The University of Manchester) ([AECN0028](#))

182 [Q89](#)

183 For more information on cap and trade schemes please see: [Cap and Trade Basics - Center for Climate and Energy Solutions](#)

184 Safe Landing ([AECN0038](#)), Richmond Heathrow Campaign ([AECN0044](#)), Aviation Environment Federation (AEF) ([AECN0045](#))

185 New Economics Foundation ([AECN0005](#))

186 Climate change Committee, [The Seventh Carbon Budget](#), 26 February 2025

187 Climate change Committee, [The Seventh Carbon Budget](#), 26 February 2025

188 Climate change Committee, [The Seventh Carbon Budget](#), 26 February 2025

- 98.** Demand management is not favoured by the industry. While the aviation industry largely agrees with the pathway to a net zero aviation sector and accepts there will be an impact on demand through increased flying costs due to the rollout of SAF and carbon removals, it does not agree that forms of ‘active’ demand management such as limiting capacity, additional taxes or levies on flying are required.¹⁸⁹ For example, Duncan McCourt, Chief Executive of Sustainable Aviation, said: “We think it is right that the industry gets the opportunity to show it can decarbonise and prove we are decarbonising before additional Government-led demand management measures are put in place”.¹⁹⁰
- 99.** The then Aviation Minister, Mike Kane MP, told us that demand management measures were not part of the suite of policy measures that he was considering for aviation decarbonisation.¹⁹¹ The Department for Transport define ‘direct’ demand management as anything that actively aims to suppress passenger demand, such as limiting the number of flights, but accepts that additional costs borne through decarbonisation measures may have an indirect impact on aviation passenger demand.¹⁹²
- 100.** Given that the Government’s own Climate Change Committee cites demand management as one of a suite of tools in achieving environmental targets, it will be necessary for government to demonstrate what additional measures beyond those already envisaged in Carbon budgets 4–6 will be relied upon if demand management is no longer government policy.
- 101.** The then Minister, in response to questions on demand management, stated that he did not “want to stop Mr and Mrs Jones, who have worked hard all year, going on their annual holiday to Mallorca.”¹⁹³ Though evidence to the Committee from Dr Graham Buss, previously a principle scientist at Shell who has worked on renewable transport fuels, suggests that other measures such as SAF deployment will already increase the costs of flights for those families.¹⁹⁴
- 102.** Johann Beckford, Senior Policy Advisor at Green Alliance, claims that costs on infrequent flyers can be avoided through designing demand management measures “in a way that the family that wants to go to Spain once a year can still take that without a significant price change.”¹⁹⁵ We heard that this could be through targeting measures on those who fly most such as

189 Sustainable Aviation ([AECN0052](#)), Airlines UK ([AECN0055](#))

190 [Q131](#)

191 [Q254](#)

192 Department for Transport ([AECN0063](#))

193 [Q266](#)

194 Dr Grahame Buss ([AECN0031](#))

195 [Q18](#)

through a frequent flyer levy.¹⁹⁶ This is supported by analysis undertaken by the New Economics Foundation which highlights that 50% of new airport capacity created through airport expansion will be used by just 3% of the population.¹⁹⁷

- 103.** Given the range of options available to government, it was disappointing to hear the Minister continue to rely on the ‘one family holiday a year’ trope to resist any consideration of demand management.

4.2.4 Technology and efficiency gains

- 104.** Efficiency gains can be made through deploying new technologies, such as more fuel-efficient planes, and changing flight paths to reduce the time in the air for planes.¹⁹⁸ Efficiency improvements such as increased plane loadings almost halved the fossil fuel intensity of aviation between 1990 and 2023.¹⁹⁹ The CCC models that the industry annual efficiency improvement would reduce aviation emissions by 13% by 2040 and be the third most valuable source of emissions savings by 2050 after SAF and demand management.²⁰⁰
- 105.** Sustainable Aviation produced a ‘Roadmap’ which presents the industry view, and sets out that efficiency savings through improved airspace and aircraft operations will save 4% of emissions by 2050 and upgrades to the current fleet and deployment of new types of aircraft would save a further 30% of emissions.²⁰¹ This is a more ambitious position to the Government who, in its Jet Zero Strategy, predicted that fuel efficiency and zero carbon aircraft would provide 19% of the emissions savings by 2050.²⁰²

196 Possible ([AECN0014](#)), New Economics Foundation ([AECN0005](#)), Bristol Airport Action Network ([AECN0010](#)), South Yorkshire Climate Alliance ([AECN0015](#)), Bristol Green Party Councillor Group ([AECN0017](#)), Stay Grounded UK ([AECN0023](#)), Dr Lois Pennington (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester); Professor Alice Larkin (Professor of Climate Science and Energy Policy at The Tyndall Centre for Climate Change Research, The University of Manchester); Dr Gaurav Gharde (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester) ([AECN0027](#)), Dr Doğuşhan Kılıç (Research Associate at The University of Manchester); Dr Paul Williams (Research Associate at The University of Manchester) ([AECN0028](#)), Mrs Jackie Head (Most recent employment: Head of Student Counselling (Retired on the grounds of ill health in 2018) at Most recent employer: University of Bristol) ([AECN0034](#)), Safe Landing ([AECN0038](#)), Luton Friends of the Earth, in association with Friends of the Earth nationally ([AECN0051](#)),

197 [Q89](#)

198 Department for Transport, [Jet Zero Strategy](#), 19 July 2022

199 Climate change Committee, [The Seventh Carbon Budget](#), 26 February 2025

200 Climate change Committee, [The Seventh Carbon Budget](#), 26 February 2025

201 Sustainable Aviation, [Net Zero Carbon Road-Map](#)

202 Department for Transport, [Jet Zero Strategy](#), 19 July 2022

106. While a number of stakeholders told us that aviation efficiency will deliver emissions savings at the necessary level to keep Net Zero achievable,²⁰³ others disagreed from the latter group argued that efficiency savings will not keep pace with the growth in demand²⁰⁴ and expressed scepticism around how quickly new technology can be rolled out.²⁰⁵

107. For example, Sustainable Aviation stated that one of the four main components for delivering Jet Zero is to:

Use less fuel by operating as efficiently as possible. This includes billions of pounds of private investment in more efficient aircraft and ground fleet to maximise efficiency on the ground, while accelerating the process of airspace modernisation.²⁰⁶

However, Group for Action on Leeds Bradford Airport disagreed:

The evidence of fuel efficiency improvement over many years shows that it has no success in reducing aviation's GHGs overall. This is because of the 'rebound effect': as fuel efficiency improves, the cost of flying reduces, incentivising people to fly more often and/or longer distances.²⁰⁷

203 Logistics UK ([AECN0021](#)), London Chamber of Commerce and Industry ([AECN0040](#)), AirportsUK ([AECN0046](#))

204 Dr Lois Pennington (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester); Professor Alice Larkin (Professor of Climate Science and Energy Policy at The Tyndall Centre for Climate Change Research, The University of Manchester); Dr Gaurav Gharde (Research Associate at The Tyndall Centre for Climate Change Research, The University of Manchester) ([AECN0027](#)), Dr Doğuşhan Kılıç (Research Associate at The University of Manchester); Dr Paul Williams (Research Associate at The University of Manchester) ([AECN0028](#)), No 3rd Runway Coalition ([AECN0033](#)), Mrs Jackie Head ([AECN0034](#)), Group for Action on Leeds Bradford Airport (GALBA) ([AECN0008](#))

205 Dr Doğuşhan Kılıç (Research Associate at The University of Manchester); Dr Paul Williams (Research Associate at The University of Manchester) ([AECN0028](#)), Safe Landing ([AECN0038](#)), Dr Grahame Buss ([AECN0031](#))

206 Sustainable Aviation ([AECN0052](#))

207 Group for Action on Leeds Bradford Airport (GALBA) ([AECN0008](#))

108. CONCLUSION

The Government's Jet Zero Strategy remains reliant on demand management measures that are as yet insufficient to deliver Net Zero objectives, especially if there is an increase in demand. The strategy relies on a far higher cost to industry to abate carbon emissions than are currently seen. It also requires significant carbon savings from the rollout of technology that is yet to be seen on a commercial scale including more efficient flying and Sustainable Aviation Fuel. Set alongside the Government's call for an expansion in the aviation sector, this risky approach puts the Government's delivery on carbon budgets and Net Zero in serious jeopardy.

109. CONCLUSION

The government's Jet Zero strategy is now a few years old and was commissioned under the previous government. Government should consider updating the analysis of the baseline and the pathways to net zero aviation. It should ensure that the plans have kept pace with technological developments in the time since the plan was published. If elements of the Jet Zero Strategy are no longer the policy of the Government, it should set out how they will ensure compliance with their environmental targets.

110. RECOMMENDATION

If the Government proceeds with airport expansion it should set out to the Committee in its response to this report, in-depth analysis on:

- How it will ensure carbon costs will reach the level the Government expected in the Jet Zero Strategy. It should also set out a realistic timeline and a plan in the event that these targets become unachievable;
- The emissions savings it considers can be delivered by the aviation sector through technological development such as Sustainable Aviation Fuel, including the most recent risk register for these innovations;
- The penalties, such as fines, the Government will impose on the aviation sector if it fails to meet the Jet Zero Strategy targets;
- The level of emissions targets it will set for the sector in relation to international flights and how it will monitor and enforce those targets; and,
- What environmental mitigations will be put in place if the sector fails to decarbonise.

111.

CONCLUSION

The aviation sector does not fully pay for its carbon emissions, whether this is through the lack of a direct carbon tax, VAT on its fuel, or the greater benefits it receives through the Emissions Trading Scheme compared to other high emitting sectors. This makes aviation artificially cheap and provides the industry with benefits other essential sectors do not benefit from.

112.

RECOMMENDATION

The Government should ensure that the aviation sector pays its fair share towards mitigating its carbon emissions and the benefits it receives in comparison to other sectors. Aviation should be included in Emissions Trading Schemes and the government should include the use of Sustainable Aviation Fuels within the ETS.

113.

RECOMMENDATION

Government should also conduct a wider review of aviation taxation to ensure that the ‘polluter pays’ principle is upheld, and the aviation industry does not receive benefits which are denied to other important industries. The aviation industry will then be incentivised to decrease emissions.

114.

CONCLUSION

Whilst it may be possible for the Government to deliver airport expansion alongside its climate and environment targets, we are concerned that the proposed environmental impact from airport expansion will make such targets significantly more difficult to achieve and at much greater effort and cost. Furthermore, the Government has not demonstrated that the economic growth from airport expansion provides enough benefit to outweigh the negative climate and environmental impacts it will lead to.

115.

RECOMMENDATION

The Government must undertake a detailed review on whether significant airport expansion will realistically allow it to deliver on its legally binding climate, environment and biodiversity targets. This should include a detailed examination of the measures that need to be taken to remain within the aviation carbon budget.

116.

RECOMMENDATION

The results of this review should be published before or alongside the refreshed ANPS and before any further substantial airport expansion projects are underway. This is crucial to enable proper scrutiny. Failure to do so could put the Government and any airport expansion projects at risk of legal challenge which would increase costs, delays and introduce greater uncertainty.

Conclusions and recommendations

Economic considerations

1. While airport expansion is likely to provide some economic growth through growth of the aviation sector, the level of growth to the UK economy provided by airport expansion is unclear and the Government has so far failed to provide substantial supporting evidence. (Conclusion, Paragraph 13)
2. Before formally agreeing any airport expansion plans, the Government should: (Recommendation, Paragraph 14)
 - 1) Commission more detailed and serious research into the net economic benefits. (Recommendation, Paragraph 15)
 - 2) Clearly set out what level of growth to the UK economy it expects. This should be broken down into both individual and cumulative airport expansions. (Recommendation, Paragraph 16)
 - 3) This should be done in a timely fashion to allow effective scrutiny of its plans and opportunities for challenge before a final decision is made. We recommend that the Government sets out in its response to this report how it will do this. (Recommendation, Paragraph 17)
3. We heard concerns that if airport expansion is focused around the South East of England it could concentrate wider growth in those regions. This could be detrimental to the aviation and airport sectors, and the local economy, around the rest of the United Kingdom. Whilst there were representations from regional airports in support of South East expansion, we are concerned that the Government to date has not adequately addressed these former concerns. (Conclusion, Paragraph 22)
4. In response to this report the Government should set out how the planned expansion of London Airports will impact the aviation and airport sector around the rest of the UK and the economic impact and level of growth in the wider regions. We recommend that this analysis should be published before a final decision is made on proposed airport expansion and prior to significant delivery of already agreed expansion to allow appropriate scrutiny. (Recommendation, Paragraph 23)

Planning considerations

5. The Government has confirmed that it is updating the Airports National Policy Statement (ANPS). We welcome the letter from the then Aviation Minister, Mike Kane MP, to the Committee following his appearance which confirmed that the Heathrow decision would not be taken before the new ANPS is published. (Conclusion, Paragraph 33)
6. We are concerned that airport expansion plans will have been produced prior to the publication of a new ANPS which ought to be in place to provide the airports with strategic guidance. We are also deeply concerned that, given a number of airport expansions will have been approved prior to the update (such as Gatwick), the Government is relying on an outdated policy framework which is inconsistent with its objectives and that airport expansion plans will have been based on that outdated framework. (Conclusion, Paragraph 34)
7. The Government should be taking a more strategic approach that should consider wider growth and planning across the whole of the UK. Finally, we are very disappointed that this approach does not allow proper consideration and scrutiny of airport expansion proposals in the light of the new ANPS. (Conclusion, Paragraph 35)
8. Whilst air pollution around Heathrow has reduced in recent years due to cleaner aircraft and road vehicles, airport expansion will make it harder for Governments, both national and local, to deliver on air quality targets. The Airports National Policy Statement fails to sufficiently account for the impact airport expansion will have on air pollution. (Conclusion, Paragraph 49)
9. The Government, when updating the Airports National Policy Statement, should impose air quality limits for areas surrounding airports covering all key air quality pollutants such as nitrogen oxides and particulate matter. Having established those limits, government should require that any airport expansion is accompanied by measures to ensure no consequential net increase in air pollution including mitigating against the impact of road traffic growth surrounding airports. In response to this report, the Government must set out what measures it will put in place, including the level of pollution it deems acceptable, and how it will ensure they are met. (Recommendation, Paragraph 50)
10. The Government should set out in its response to this report what work and research it is supporting to reduce non-CO2 emissions that damage air quality around airports. It should also confirm whether it has identified which current aircraft have the least impact on air quality around airports. We recommend that the Government should consider incentivising airlines

to utilise airplanes that use technology or techniques that reduce such emissions. This should include consulting the aviation industry within six months of this report on the feasibility of reducing the age of the fleet. (Recommendation, Paragraph 51)

11. The Airports National Policy Statement fails to account for noise pollution. Whilst improvements have been seen in reducing the level of noise made by individual flights, more must be done to minimise the impact on those who live under and around flight paths. (Conclusion, Paragraph 58)
12. The Government should ensure that it is actively working to minimise and mitigate all impacts of noise pollution on relevant populations caused through flying. It should also include a target, within the new ANPS, on the level of acceptable noise from flights both individually and cumulatively. The Government should set out this target in the response to this report. (Recommendation, Paragraph 59)
13. We understand the need for the Government to modernise the airspace around the UK, particularly if this will minimise the queuing of planes at airports and reduce the time planes spend circling before they can land. However, this work is likely to expand the area covered by flight paths and thereby increase the number of people directly impacted by noise from flying. (Conclusion, Paragraph 60)
14. The Government must publish an impact assessment of its airspace modernisation work in regard to how it will change noise impacts as well as publish a map which allows people to see where the noise of aircraft is likely to exceed the World Health Organisation (WHO) recommended levels. Where this work introduces noise pollution to new areas, the Government must expand its mitigation work including the requirement of industry funding for measures to decrease the impact on the population who live in the areas affected, such as improved sound insulation. This should be done alongside publication of the updated ANPS so that it can inform scrutiny of the Government's proposals. We also express concern about the impact on biodiversity. The Government should undertake an impact assessment on the impact on biodiversity and put mitigations in place. (Recommendation, Paragraph 61)

- 15.** The Airports National Policy Statement (ANPS) is not fit for purpose and requires updating to reflect Government policy. The ANPS specifically fails to:

- Provide an integrated view on the role of the aviation and airport system across the country as a whole,
- Provide information on environmental limits including air pollution limits, noise limits and greenhouse gas emissions,
- Set out how cumulative impacts from all current UK airports and future airport expansion should be accounted for in the planning process.

This leads to environmental risks and leaves future expansion applications open to legal challenges, slowing progress of any airport expansion.
(Conclusion, Paragraph 68)

- 16.** The Government should update the Airports National Policy Statement no later than six months after the publication of this report. The updated Statement should:

- set out a coherent plan from Government about the airport and aviation system that takes into account wider innovations such as flight path modernisation and airport capacity around the whole of the UK,
- include specific, measurable limits for key aspects of air pollution, noise pollution and greenhouse gas emissions,
- set out how the Development Consent Order process will account for cumulative environmental impacts from airports across a wide area to provide a holistic picture of the aviation system and ensure that all parallel airport expansion is sustainable.
(Recommendation, Paragraph 69)

Plans to mitigate environmental impacts of airport expansion

- 17.** Whilst the Committee understands the Government position that it includes international aviation emissions within its carbon calculations, the UK is yet to formally legislate to include international aviation emissions within the Carbon Budgets, despite it agreeing to do so previously.
(Conclusion, Paragraph 79)

18. We reiterate the recommendation made by the Climate Change Committee, our predecessor Committee and others that the Government makes Parliamentary time available to introduce the necessary legislation to formally include international aviation emissions within Carbon Budgets and its Net Zero targets. The Government should do this within the current Parliamentary session. (Recommendation, Paragraph 80)
19. Whilst a reduction in aviation emissions is necessary to deliver a net zero aviation sector, an important contribution to the UK's efforts is the reduction of non-CO2 effects, such as contrails. (Conclusion, Paragraph 81)
20. Within six months of the publication of this report the Government must consult on airspace-wide contrail avoidance measures. Furthermore, given the significant role that non-CO2 effects play in global warming, the Government must account for these in its assessment of the overall impact of the aviation sector. (Recommendation, Paragraph 82)
21. The Government's Jet Zero Strategy remains reliant on demand management measures that are as yet insufficient to deliver Net Zero objectives, especially if there is an increase in demand. The strategy relies on a far higher cost to industry to abate carbon emissions than are currently seen. It also requires significant carbon savings from the rollout of technology that is yet to be seen on a commercial scale including more efficient flying and Sustainable Aviation Fuel. Set alongside the Government's call for an expansion in the aviation sector, this risky approach puts the Government's delivery on carbon budgets and Net Zero in serious jeopardy. (Conclusion, Paragraph 108)
22. The government's Jet Zero strategy is now a few years old and was commissioned under the previous government. Government should consider updating the analysis of the baseline and the pathways to net zero aviation. It should ensure that the plans have kept pace with technological developments in the time since the plan was published. If elements of the Jet Zero Strategy are no longer the policy of the Government, it should set out how they will ensure compliance with their environmental targets. (Conclusion, Paragraph 109)
23. If the Government proceeds with airport expansion it should set out to the Committee in its response to this report, in-depth analysis on:
 - How it will ensure carbon costs will reach the level the Government expected in the Jet Zero Strategy. It should also set out a realistic timeline and a plan in the event that these targets become unachievable;

- The emissions savings it considers can be delivered by the aviation sector through technological development such as Sustainable Aviation Fuel, including the most recent risk register for these innovations;
 - The penalties, such as fines, the Government will impose on the aviation sector if it fails to meet the Jet Zero Strategy targets;
 - The level of emissions targets it will set for the sector in relation to international flights and how it will monitor and enforce those targets; and,
 - What environmental mitigations will be put in place if the sector fails to decarbonise. (Recommendation, Paragraph 110)
- 24.** The aviation sector does not fully pay for its carbon emissions, whether this is through the lack of a direct carbon tax, VAT on its fuel, or the greater benefits it receives through the Emissions Trading Scheme compared to other high emitting sectors. This makes aviation artificially cheap and provides the industry with benefits other essential sectors do not benefit from. (Conclusion, Paragraph 111)
- 25.** The Government should ensure that the aviation sector pays its fair share towards mitigating its carbon emissions and the benefits it receives in comparison to other sectors. Aviation should be included in Emissions Trading Schemes and the government should include the use of Sustainable Aviation Fuels within the ETS. (Recommendation, Paragraph 112)
- 26.** Government should also conduct a wider review of aviation taxation to ensure that the ‘polluter pays’ principle is upheld, and the aviation industry does not receive benefits which are denied to other important industries. The aviation industry will then be incentivised to decrease emissions. (Recommendation, Paragraph 113)
- 27.** Whilst it may be possible for the Government to deliver airport expansion alongside its climate and environment targets, we are concerned that the proposed environmental impact from airport expansion will make such targets significantly more difficult to achieve and at much greater effort and cost. Furthermore, the Government has not demonstrated that the economic growth from airport expansion provides enough benefit to outweigh the negative climate and environmental impacts it will lead to. (Conclusion, Paragraph 114)
- 28.** The Government must undertake a detailed review on whether significant airport expansion will realistically allow it to deliver on its legally binding climate, environment and biodiversity targets. This should include a detailed examination of the measures that need to be taken to remain within the aviation carbon budget. (Recommendation, Paragraph 115)

29. The results of this review should be published before or alongside the refreshed ANPS and before any further substantial airport expansion projects are underway. This is crucial to enable proper scrutiny. Failure to do so could put the Government and any airport expansion projects at risk of legal challenge which would increase costs, delays and introduce greater uncertainty. (Recommendation, Paragraph 116)

Formal minutes

Wednesday 15 October 2025

Members present

Mr Toby Perkins, in the Chair

Olivia Blake

Julia Buckley

Barry Gardiner

Sarah Gibson

Chris Hinchcliff

Martin Rhodes

Dr Roz Savage

Blake Stephenson

Alison Taylor

Cameron Thomas

John Whitby

Sammy Wilson

[...]

The Committee deliberated.

Airport expansion and climate and nature targets

Draft Report (*Airport expansion and climate and nature targets*), proposed by the Chair, brought up and read.

Paragraphs 1 to 116 read and agreed to.

Summary agreed to

Resolved, That the Report be the Fifth Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[...]

Adjournment

Adjourned till Wednesday 22 October 2025 at 2.00 pm.

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

Wednesday 14 May 2025

Celeste Hicks, Policy Manager, Aviation Environment Federation; **Johann Beckford**, Senior Policy Advisor, Green Alliance; **Professor Rob Miller**, Director, Whittle Laboratory, University of Cambridge [Q1–30](#)

Dr Lisa Lavia, Managing Director, Noise Abatement Society; **Alethea Warrington**, Head of Aviation, Energy and Heat, Possible; **Paul Beckford**, Policy Director, No 3rd Runway Coalition [Q31–62](#)

Wednesday 18 June 2025

Andrew Meaney, Partner and Head of Transport, Oxera; **Dr Alex Chapman**, Senior Economist, New Economics Foundation; **Dr Stuart Jenkins**, Research fellow, University of Oxford [Q63–111](#)

Duncan McCourt, Chief Executive, Sustainable Aviation; **Matthew Gorman MBE**, Director of Carbon Strategy, Heathrow; **Neil Robinson**, Chief Sustainability Officer, Manchester Airports Group [Q112–165](#)

Wednesday 16 July 2025

Dr Pauleen Lane CBE, Professional Lead for Infrastructure, Planning Inspectorate; **Ian Thynne**, Head of Environmental Planning Specialists, Hillingdon Council; **Peta Donkin**, EIA Director - Infrastructure and Energy, National Infrastructure Planning Association [Q166–210](#)

Mike Kane MP, Parliamentary Under-Secretary of State (Minister for Aviation, Maritime and Security), Department for Transport; **Hannah Newell**, Director for Heathrow Expansion, Department for Transport; **Sonia Krylova**, Deputy Director, Carbon Budget Delivery and Framework Net Zero Strategy Directorate, Department for Energy Security and Net Zero; **David Silk**, Director for Aviation, Department for Transport [Q211–310](#)

Published written evidence

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

AECN numbers are generated by the evidence processing system and so may not be complete.

- | | | |
|----|--|--------------------------|
| 1 | ***Multiple submitters:Dr Doğuřhan Kılıç (Research Associate, The University of Manchester); and Dr Paul Williams (Research Associate, The University of Manchester) | AECN0028 |
| 2 | ***Multiple submitters:Dr Lois Pennington (Research Associate, The Tyndall Centre for Climate Change Research, The University of Manchester); Professor Alice Larkin (Professor of Climate Science and Energy Policy, The Tyndall Centre for Climate Change Research, The University of Manchester); and Dr Gaurav Gharde (Research Associate, The Tyndall Centre for Climate Change Research, The University of Manchester) | AECN0027 |
| 3 | ***Multiple submitters:Stephen Clark and David Gilbert (both members of TAG (community organisation), Teddington Action Group (TAG)); and Clark and Gilbert | AECN0007 |
| 4 | Airlines UK | AECN0055 |
| 5 | AirportsUK | AECN0046 |
| 6 | Alfanar | AECN0020 |
| 7 | Aviation Environment Federation | AECN0060 |
| 8 | Aviation Environment Federation (AEF) | AECN0045 |
| 9 | Aviation Impact Accelerator | AECN0057 |
| 10 | Bristol Airport Action Network | AECN0010 |
| 11 | Bristol Green Party Councillor Group | AECN0017 |
| 12 | British Chambers of Commerce | AECN0013 |
| 13 | Buss, Dr Grahame | AECN0031 |
| 14 | CAGNE | AECN0002 |
| 15 | Campaign against Climate Change | AECN0041 |

16	Clean Air in London	AECN0042
17	Department for Transport	AECN0063
18	Department for Transport	AECN0032
19	Gatwick Area Conservation Campaign	AECN0043
20	Grantham Institute – Climate Change and the Environment, Imperial College London	AECN0056
21	Grimes, Janet	AECN0016
22	Group for Action on Leeds Bradford Airport (GALBA)	AECN0008
23	HACAN (Heathrow Association for the Control of Aircraft Noise)	AECN0036
24	Head, Mrs Jackie (Most recent employment: Head of Student Counselling (Retired on the grounds of ill health in 2018), Most recent employer: University of Bristol)	AECN0034
25	Heathrow Airport Limited	AECN0064
26	Heathrow Airport Limited	AECN0039
27	Hillingdon Council	AECN0062
28	IATA	AECN0035
29	Institute of Acoustics	AECN0026
30	Jeremy Rodell	AECN0009
31	Jones, Mr Chris (NA, NA)	AECN0025
32	Logistics UK	AECN0021
33	London Borough of Hillingdon	AECN0050
34	London Chamber of Commerce and Industry	AECN0040
35	Luton Friends of the Earth, in association with Friends of the Earth nationally	AECN0051
36	Manchester Airports Group (MAG)	AECN0054
37	McIntyre, Mr Paul	AECN0003
38	Metz, Dr David (honorary professor, Centre for Transport Studies, University College London)	AECN0004
39	New Economics Foundation	AECN0005
40	No 3rd Runway Coalition	AECN0033
41	No Airport Expansion Campaign Group; and 26 other campaigning groups and NGOs working in the area of aviation growth	AECN0011
42	Noise Abatement Society	AECN0061

43	Opportunity Green	AECN0024
44	Pitcairn, Neil (Board director, UK Without Incineration Network)	AECN0030
45	Possible	AECN0014
46	Powner, Ms Marj (Chair/Vice Chair, Chair (Friends of Carrington Moss), Vice Chair (Save Greater Manchester's Green Belt Group and Community Planning Alliance))	AECN0019
47	Rae, Mr Anthony (volunteer aviation campaigner, None)	AECN0048
48	Regional and Business Airports Group	AECN0058
49	Richmond Heathrow Campaign	AECN0044
50	SASHA Coalition	AECN0037
51	Safe Landing	AECN0038
52	South Yorkshire Climate Alliance	AECN0015
53	Stay Grounded UK	AECN0023
54	Sustainable Aviation	AECN0052
55	Teddington Action Group	AECN0006
56	Thames Valley Chamber of Commerce & Industry	AECN0022
57	The Chartered Institute of Logistics and Transport (UK)	AECN0029
58	The Friends of Richmond Park	AECN0053
59	UK Noise Association	AECN0001
60	Wilson, Munira (Member of Parliament, UK Parliament)	AECN0012
61	ZeroAvia	AECN0059

List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the [publications page](#) of the Committee's website.

Session 2024–26

Number	Title	Reference
4th	Flood resilience in England	HC 550
3rd	The UK and the Antarctic environment	HC 499
2nd	Governing the marine environment	HC 551
1st	The role of natural capital in the UK's green economy	HC 501
5th Special	The UK and the Antarctic environment: Government Response	HC 1273
4th Special	Governing the marine environment: Government Response	HC 1272
3rd Special	The role of natural capital in the green economy: Government Response	HC 1242
2nd Special	Net zero and UK shipping: Government Response	HC 705
1st Special	Enabling sustainable electrification of the economy: Government Response	HC 564