Written evidence submitted by Stop Heathrow Expansion (AAS0036)

Introduction and executive summary

Stop Heathrow Expansion is a group of residents, mainly from the London Borough of Hillingdon, directly affected by proposals for Heathrow expansion, particularly in the areas immediately around the airport. We campaign against expansion at Heathrow Airport, both in the form of additional runways and any increase in flights beyond the current cap of 480,000 ATMs.

We also work to reduce both air and noise pollution from Heathrow Airport and related road traffic, as well as to preserve community life and heritage in the villages near Heathrow, and to end the repeated threats and impacts to the area arising from Heathrow operations. Our group is supported by all local political parties. This response addresses the theme of sustainability, with a brief note on regional connectivity. We would be happy to provide further information, should the Committee require.

We believe that too much faith is being placed in technologies to decarbonise aviation that are either still in their infancy or are yet to be developed. The development and take-up of Sustainable Aviation Fuels (SAF) must be welcomed, but to reap the benefits they could bring, it is necessary to introduce a mandate. Incentives too often fail to deliver. Our answer seeks to highlight the problems with SAF in the context of the Heathrow expansion proposals.

1) Sustainability

Our answers on this theme are divided into two different themes, setting out our position on both Jet Zero emissions and Sustainable Aviation Fuels.

a) Jet Zero aviation emissions

1.1 The Government's recent Jet Zero consultation lacked substance. It promoted a "business as usual" stance in the interim. Other parts of the economy have been decarbonising whilst aviation emissions have continued to grow. The proposals in the consultation would allow aviation emissions to grow until 2030 and then reduce afterwards. Consumers are being asked to make very expensive life changes to reduce their carbon footprint – such as

changing their vehicles and their household heating – it is not an equitable solution. Only 15% of the population take 75% of flights and ordinary people, those who cannot afford to fly, will be paying for aviation emissions even though they will not be contributing to those emissions.

1.2 The Climate Change Committee (CCC) recommended demand management within the sector over next decade to reduce aviation emissions; however, the Jet Zero proposals do not include any that might manage demand. Demand management and a frequent flyer levy should be part of the Jet Zero package.

1.3 The Jet Zero consultation is loaded with "ifs, buts and maybes"; there is no guaranteed route to reaching Jet Zero without reducing the demand for flying. Too much emphasis is put on technologies – both in aircraft designs and sustainable fuels – that are not yet available or are in their infancy, and it is not certain if they can be available and sufficiently scaled-up in the time allowed.

1.4 We do not agree with the Government's proposal to review Jet Zero plans every 5 years. The Government must review annually. A review only every 5 years would not allow Government policy to change if the technologies are not developed and emissions either remain higher for longer or, as would most likely be the case, continue to grow.

1.5 Heathrow is the single largest polluter in the UK, and second highest polluting airport in the world. Its emissions account for over half of all UK aviation emissions and emits around 20MtCO2 of carbon annually. A 3rd runway would increase this by approximately 7MtCO2 to 27MtCO2.

1.6 Following the announcement on 6th September 2021 that a review of the Airports National Policy Statement is not appropriate at this time, it is our view that the Government should initiate a review of the Airports National Policy Statement once its plans for Jet Zero emissions are announced. This timescale should not be allowed to slip and should be in early 2022 at the very latest once the consultations responses are considered.

1.7 The Government has adopted the recommendations of the CCC on carbon targets and, as the Queen's Speech confirmed on 11th May, these are to be enshrined into law. The Government committed to reducing carbon emissions

by 78% (against 1990 levels) in advance of 2035 and it is demanding that, for the very first time, aviation emissions are included within targets for reductions.

1.8 As the CCC stated, this means that there is no room for a net expansion of UK aviation and were there to be an expansion of aviation at Heathrow this would need to be offset by restrictions at regional airports (whether through reductions in operations or closures).

b) Sustainable Aviation Fuels (SAF)

1.9 In September 2021, a domestic flight using SAF made its first commercial journey between Scotland and London. This development is important, but it is far from being used on other short haul or long-haul routes in time for when a proposed third runway would open in the early 2030s.

1.10 Current global targets for approximately 50% alternative jet fuel use in 2050 would require over 1,000 bio-jet fuel refineries to be built: more than three per month for the next 30 years. Today, there are just two facilities.

1.11 In 2010, the aviation industry pledged to source 10% of fuels from sustainable sources by 2020. Yet by 2018, the industry had managed to source just 0.002% – they seem to be falling well short of their promises.

1.12 We are particularly concerned at the lack of an indication as to how much investment the industry, or Government, is willing to commit to enable alternative aviation fuel generation to be scaled up and sold at a price that is competitive with kerosene. Furthermore, it is difficult to make a strong case for public investment in initiatives such as this which benefit one sector when there are several pressing demands for public capital, in the transport area alone, that could more effectively address the decarbonisation challenge.

1.13 It is a requirement to get to net zero emissions *before* 2050 and reduce emissions by 78% by 2035. A carbon intensity reduction is both needed and must be an amount that can be offset in compensation, which is an apparent omission in the consultation.

1.14 Further, the idea of “drop-in” fuels being used is likely to be a major distraction. In many cases the CO2 or greenhouse gas emissions in making alternative fuels are considerable and are not being considered in

computations. The “Net Zero” computation *must* include greenhouse gas emissions from producing the fuels as well as those from the combustion process itself.

1.15 There is no universal agreement of the term ‘sustainable’ for Sustainable Aviation Fuels, nor is it clear how emissions in production are accounted for. There is an assumption of benefit from waste being turned into fuel as opposed to being left to rot (thus generating methane), however using jet fuel from waste would still generate similar levels of carbon emissions to kerosene. To achieve net zero both methane and carbon emissions need to be avoided. Zero emissions fuels need to be mandatory.

1.16 The Government’s plan to expand Heathrow should be reviewed when the results of the recent Jet Zero consultation are published in the coming months.

1.17 The SAF mandate should begin as soon as possible, and by no later than December 2022. We believe this is justified given the urgent need for the aviation sector to emit less carbon as part of the fight against the wider climate crisis.

1.18 2030, as suggested in the Government’s recent SAF consultation, is too late for a SAF-specific review to be undertaken. An initial review should be made by 2025 at the latest, and then annually, to ensure both that the proposed policy framework is still relevant and robust, and the aviation industry is delivering as required. If deliverability is not at the required rate, then this will impact other policies such as Heathrow expansion and plans to decarbonise domestic aviation by 2040.

1.19 Greenhouse gas emissions (GHG) reductions should be claimed only once and should not be rewarded under the Renewable Transport Fuel Obligation once the mandate is in place. It is necessary to ensure that the Department for Transport’s different SAF policies do not reward the same tonne of CO2 reduction twice. This is crucial given the likely competition for alternative fuels from across industry, manufacturing, and other transport modes.

1.20 A GHG emissions scheme, based on tradable credits, simply encourages organisations to avoid carbon reduction processes and fuels by buying their way out of the obligation. The UK must reduce our carbon and greenhouse gas emissions, but trading credits is not the optimal way to achieve this.

1.21 SAF are often described as the primary solution for aviation decarbonisation, but this gives a false impression that airports like Heathrow

can continue to expand without worrying about the climate impacts. However, SAF might only provide a tiny and expensive solution without significant government investment and intervention in the market. This investment may not be possible or politically welcomed following the recent announcement of tax increases and the significant "hit" these will have on the pockets of ordinary people.

1.22 It is important to note that even if airports can "claim" to be carbon neutral, this ignores the flights that use these airports. Consequently, Heathrow is the single largest polluter in the UK, and its emissions account for over half of all UK aviation emissions. It currently emits around 20MtCO2 of carbon annually. A 3rd runway would increase this by approximately 7MtCO2 to 27MtCO2.

1.23 Any mandate on SAF must specify industry targets. Deliverability must be measured annually to maintain progress on the implementation of the mandate.

1.24 The Government must ensure complete transparency in the use of alternative fuels, their emissions on combustion and production and be willing to enforce demand management policies until such as time that SAF production and use is genuinely sustainable, is regularly used on both short and long-haul flights, is cheaper than kerosene and has met or exceed net zero targets (2035). Until then, policies to add 260,000 extra ATMs per annum or the interim addition of 25,000 ATMs per annum, in the form of Heathrow expansion, must be withdrawn.

2) Regional connectivity

2.1 The proposal outlined in the Government's Jet Zero plans to decarbonise domestic aviation by 2040 is welcomed. However, it appears to be a passive attempt since domestic flights account for just 4% of UK aviation emissions. UK domestic flights should be eliminated from schedules where an alternative train route is in operation.

2.2 To improve connectivity between the regions and nations in the UK, the Government should incentivise greater use of rail travel. The cost of flying remains inexpensive compared to other public transport, in part because of the tax regime for aviation fuel. Train operators should be encouraged to take

on the aviation competition. Recently, a new operator, Lumo, are offering all fares lower than the average price of a plane ticket for the same route. The recent call by the Campaign for Better Transport to outlaw domestic flights between destinations that can be reached by train in under five hours, should be explored further. This could cut carbon-intensive travel between Heathrow and destinations on the UK mainland such as Teesside, Manchester, Newcastle, Glasgow, Edinburgh and Newquay; all of which can be reached in under five hours by train. Currently, there are five returns flights per day between Heathrow and Manchester Airports.

2.3 Any review of the Airports National Policy Statement (ANPS) must be a meaningful review of all airports across the UK and not limited to just those in the Southeast with the view to creating a new or larger hub airport.

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