

Planning Application 18/P/5118/OUT

Applicant: Bristol Airport (majority owned by Ontario Teachers' Pension Plan, Canada)

Submission to North Somerset District Council by the Parish Councils Airport Association

Addendum 9 – PCAA response to Bristol Airport's roadmap to reduce carbon emissions.

Bristol Airport announced its aim to become a 'Net Zero Airport' for 2050 on 24 July 2019. Any action to reduce carbon emissions in a climate emergency is welcome and to be commended but the roadmap is seriously lacking and should be put into perspective alongside the scale of the climate crisis. The PCAA continue to object to the application and have the following comments:

The roadmap only looks at carbon emissions; it omits any reference to the ozone impact from contrails and radiative forcing of emissions carried out in the higher atmosphere which increase the negative impact of the emissions by a factor of perhaps three times.

Airport Carbon Accreditation Scheme Scope 1 and 2

The roadmap commences with emissions which are in the airport's direct control known as Scope 1 and 2 with the ambition to become 'carbon neutral' by 2025. These scopes omit car travel to and from the airport and aviation's carbon emissions. Bristol Airport, like most other business, is trying to decarbonise and they all consider similar measures such as solar panels, low energy LED lighting, electric vehicles and changing to a renewable electricity supplier. Businesses and individuals are all expected to take these sorts of actions as required behaviour in a climate crisis but these steps should not be seen as justification for increasing emissions through expansion of a highly polluting sector such as aviation.

The airport expects to have an electric vehicle fleet by 2025 which is good - but what about their diesel buses? The Operations Monitoring Report in 2018 shows an increase in use of diesel from the new fleet of buses owing to the staff car park now being located on the South side. We question when the airport will make these new buses redundant as they are new and have only just been purchased. These emissions are in their direct control and should not be offset by investing in emission-reduction activities in other sectors. Offsetting should be used only as a last resort, so we would expect NSC to require the airport to change the fleet of buses before 2025.

Scope 3

Scope 3 is for offsetting emissions from Scope 1 and 2, those which are outside the airport's own control. Our understanding is that airports are free to choose the offset provider meaning that prices vary and the offsets can be in a variety of sectors. Typical offset prices in the voluntary offset markets are as low as £2 per tonne (some cheaper), although buying and retiring allowances from a capped scheme like the EU

Emissions Trading Scheme would currently cost around 30 Euros per tonne. Bristol Airport stated at the Airport Consultative Meeting 24 July that offsetting for Scope 1 and 2 would be from providers in the UK and may be local ones. The PCAA are concerned that, if the price of offsetting is lower than the cost of decarbonising, the airport will continue to pollute rather than alter operational practices. We expect North Somerset Officers to explain in detail how this point will be avoided so that decarbonising actually occurs in the timeframe set under the roadmap with minimum reliance on offsetting.

The roadmap shows that emissions for Scope 1 and 2 including staff travel total approximately 13.8 kt pa. Car emissions for passengers travelling to and from the airport and aviation emissions together come to 931.2 kt. This figure is 67 times larger and makes up 98.5% of the total. So Bristol Airport, in their roadmap, are focusing on just 1.5% of emissions that relate to the airport. The full total is a staggering amount. The airport has stated that the much-larger set of emissions will be offset and not be part of the accreditation scheme. However, the granting of permission will enable massive growth in emissions at a level that dwarfs the carbon footprint from ground operations.

(Figures are from a Bristol Airport document titled 'Becoming net zero airport' at www.bristolairport.co.uk/about-us/news-and-media/news-and-media-centre/2019/7/bristol-airport-carbon-roadmap)

Road journeys

The press release sent to parishes and others had a strap headline 'Carbon levy to offset all road journeys'. But reading further into the press release it stated '*Emissions from road journeys will be offset by a new carbon levy on vehicles using the Express Drop Off – the least sustainable way to get to the Airport. When it is introduced later this year, the proceeds of the levy will be used to offset emissions from all surface access journeys.*' But the Express Drop Off (also known as Meet and Greet or Kiss and Drop) are not all surface access journeys. They are just a small proportion of journeys and the press release is guilty of being misleading. The PCAA have requested figures on the number of Express Drop Off car journeys as they cannot be found in the Environmental Statements on transport or parking relating to the planning application.

By placing a carbon levy on some surface access journeys the airport has accepted the principle that car travel needs to be minimised and that use of public transport needs to be improved. Currently the modal target split of passengers travelling on public transport is 12.5% and the target figure for 12 mppa is 15%. This figure of 15% remains the same as under the planning consent of 10 mppa. But there is a major conflict of interest and this is why the airport hasn't placed a carbon levy to offset emissions from all surface access journeys. Bristol Airport is heavily dependent on car parking revenue. One third of all income is from car parking. Car parking is to be on the south side in green belt and will cause further biodiversity loss. The airport should put a levy on all car journeys to the airport to provide greater incentives to use public transport. They are unwilling to do this because it threatens their car parking revenue but NSC has a duty of care to residents and to the environment and should not accept the half-measure proposed by the airport.

What is so depressing is that the airport has failed deliver MSCP 2 and the public transport interchange which has been promised under the consent to grow to 10 mppa. The public interchange would help provide better public transport and is fully supported by communities. Residents from south of the airport and the Chew Valley could then park at the airport and access public transport taking more cars off the road. This should be a priority action and an action that takes place under the planning consent of 10 mppa. Please see the PCAA original submission for further details on car parking and green belt arguments. What we can say is that the press release is not telling the whole truth as not all road journeys will have a carbon levy placed on them.

A carbon levy does not resolve the issue of North Somerset Council's commitment to reduce carbon emissions which includes road journeys to and from the airport. The commitment made in 2018 states '*As part of our commitment to action on climate change, the council is adopting a local carbon reduction target. A carbon reduction target agreed across West of England local authorities (North Somerset, Bristol, South Gloucestershire & Bath and North East Somerset) is to reduce carbon emissions by 50% by 2035 from a 2014 baseline. This target is set out in the West of England Joint Spatial Plan . In North Somerset the largest percentage of emissions is from the transport sector.*'¹ The PCAA question whether car travel to and from the airport has been excluded. We have found no evidence in any policy documents that states that car travel to and from airports should be excluded from emissions targets set by the Government. All documents state that car travel should be minimised not increased and emissions reduced. The PCAA expect North Somerset Officers to comment on this point and to show how reductions will occur, as they must, in order to keep within carbon budgets and the Climate Change Act. The 2017 baseline figure for vehicle emissions is 184.45 (ktCO₂/yr). In 2026 the future baseline figures for vehicle emissions is 214.23 (Tables 17.3 and 17.4).² This is an increase of 16% in the annual level of vehicle emissions. This figure obviously excludes passengers who take public transport.

To achieve a reduction in passenger transport to and from the airport by car the application needs to be turned down. It simply isn't good enough to carbon-levy a proportion of passenger journeys. Even if a carbon levy was placed on all emissions from road journeys no carbon reduction would be achieved unless every car was electric or every passenger had changed their behaviour and started to travel to and from the airport by public transport, and this simply isn't the case under the application.

Aviation emissions

The Government document titled 'Aviation 2050' Consultation states that 'the aviation sector could represent a 25% share of the UK's greenhouse gas emissions by 2050'.³ The Government has accepted the Committee on Climate Change (CCC) recommendations that emissions from UK-departing flights should be at or below 2005 levels in 2050. The target figure was previously 37.5MtCO₂ by 2050 now reduced to 31.5. Mt CO₂ in line with keeping temperature rise to 1.5°C . Bristol Airport has failed to address this target in the application and roadmap. The CCC has stated that in order for airports to become 'Net Zero Airports' there will have to be constraints introduced. Bristol Airport avoids showing how, with other expanding

airports in the UK, it is possible to reach the target set. If constraints are placed in the near future on the aviation sector, as suggested by the CCC, much of the future investment in airport infrastructure will become redundant.

Bristol Airport's growth to 12 mppa is going to add 746.8 kt from flights and we have a climate emergency. Rather than reducing aviation emissions, the airport has opted to stabilise net carbon emissions from flights at 2020 levels through the implementation of the CORSIA offsetting scheme.

There is a lot wrong with the CORSIA scheme. The goal is currently not aligned to the Paris Agreement or even to previous agreements of the UNFCCC; it has no long-term target, and is envisaged to run only until 2035; it addresses emissions only above their level in 2020 (emissions below that level are not accounted for); it does not have full global support (China has yet to confirm whether or not it will participate, and the voluntary phase between 2021 and 2026 will cover only around three-quarters of eligible emissions); and it is built on an unrealistic assumption that there will be a long term supply of cheap offset credits (decisions have yet to be taken on the likely units that will be eligible and how credible they are). The Committee on Climate Change has advised the Government that offsetting for international flights should be in the UK. It is obvious that the real intent of the aviation sector and Bristol Airport is not to decrease or reduce aviation emissions.

The PCAA point out that there is only so much that new technology can do. In terms of technology development, zero carbon aircraft are currently a very long way off. No electric aircraft big enough to carry passengers are anticipated even for short haul flights until around 2055. Airspace change might shave a few tonnes of CO₂ off the total per flight.

So Bristol Airport has put a roadmap forward which simply does not resolve the problem of reducing aviation emissions. Offsetting doesn't make emissions go away. If an offsetter pays for an emissions reduction that needs to happen anyway then that tonne of CO₂ emitted from the aircraft will still cause warming and be inconsistent with a "net zero" climate goal.

Conditions in the application on the Carbon and Climate Change Plan are inadequate due to the climate emergency. The application suggests that, through conditions, progress against agreed targets and recommendations will be reported in the Operations Monitoring Report. There are no penalties suggested for not reaching any targets proposed. The Carbon and Climate Change Action Plan is to be reviewed every five years. The Plan should be reviewed annually.

The PCAA continue to recommend that the application is refused.

Reference

1. www.n-somerset.gov.uk/wp-content/uploads/2018/05/Climate-Local-Commitment-refresh-2018.pdf
2. Environmental Statement, Carbon and other Greenhouse Gas Emissions
planning.n-somerset.gov.uk/online-applications/files/794153664B9FDCC38E6B4D2D5D9A3CE4/pdf/18_P_5118_OUT-ENV_STMT_-_CHP_17_-_CARBON___OTHER_GHG-2757510.pdf
3. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769695/aviation-2050-web.pdf

For Information

Question submitted to Bristol Airport Consultative Committee meeting to be held on Wednesday, 23 October 2019.

‘Can the Bristol Airport Management Team please inform the committee what percentage of cars to and from the airport used the ‘Express Drop Off’ in 2018? What percentage of car parked at the MSCP? What percentage of passengers used low cost parking’