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The Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities and Local Government
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7 May 2021

Dear Secretaries of State

REQUEST FOR A MORATORIUM ON AIRPORT EXPANSION

In December 2019 AEF and some of the community group signatories to this letter wrote to ask you to intervene to suspend the determination of all applications to increase the physical capacity of UK airports, or their approved operating caps, until noise and climate policies were in place, against which such applications could be judged. You responded by indicating that the Government's policies supported additional airport expansion in the South East, and airports making best use of existing capacity.

Since then, however, there has been a strengthening of the Government's ambition to address aviation's climate change impacts, including the significant decision to include international aviation and shipping emissions in the UK's carbon budgets and net zero legislation.

We are still awaiting publication of the Government's net zero aviation policy. However, the Climate Change Committee has made clear that adequate airport capacity already exists to meet the future levels of demand it deems to be compatible with a balanced pathway to achieving net zero by 2050, and advises therefore that there should be no net increase in airport capacity unless the industry over-delivers emissions reductions. The inescapable logic is that any approved expansion at one airport will necessarily impact upon the existing capacity that can be permitted at others around the country.

The pandemic has damaged the business capability of some airports and airlines, reducing their ability to invest, particularly in the innovation required to deliver net zero. However, it appears not to have affected airports' appetite to pursue permission to expand. All of these expansion plans have the potential to increase greenhouse gas emissions, and therefore run contrary to the recommendations of the CCC. We believe that there are compelling reasons for you to reconsider the introduction of a moratorium on airport expansion.

Existing policy does not take account of the Government's increased climate ambition for aviation. Until the Government has consulted on its preferred strategy for net zero aviation, and published its policy, it is impossible to see how local authorities or the Government could justify any given airport expansion as conforming to binding carbon budgets and targets. Assessment needs to be made of the cumulative impacts of these expansions which we estimate, based on an extrapolation of DfT's own forecasts, could add almost 9MtCO₂ by 2050 if allowed to proceed.

While the planning process requires applicants to take such cumulative impacts into account, it is difficult for local authorities accurately to account for proposals that are at different stages of the planning approval process, and to assess the implications in any meaningful way.

Allowing some decisions to be determined locally at this time prejudices the outcome of the Government's consultation on net zero aviation. We welcome the notice issued to Leeds City Council to postpone sending out a final decision letter while consideration is given to a call-in, and we hope that similar action will be taken in respect of Eastleigh Borough Council's decision to approve the runway extension at Southampton Airport.

We welcome the Government's readiness to challenge the aviation industry to accelerate its efforts to decarbonise through initiatives like the Jet Zero Council and inclusion in the Climate Change Act. But an uncoordinated and unplanned approach to airport expansion before appropriate policy is in place puts achievement of net zero in jeopardy. We suggest that until the Government has framed a net zero plan for the sector, including a national strategy for airport capacity which acknowledges and plans for the new carbon constraints, it would only be responsible to impose a blanket moratorium on all airport expansion planning.

Yours sincerely,

Tim Johnson, Director, Aviation Environment Federation
Hilary Burn, Chair, Parish Councils Airport Association (Bristol)
Brian Ross, Deputy Chair, Stop Stansted Expansion
Peter Barclay, Chairman, Gatwick Area Conservation Campaign
Charles Lloyd, Aviation Communities Forum
Andrew Lambourne, Luton And District Association for the Control of Aircraft Noise
Chris Foren, Chair of Group for Action on Leeds Bradford Airport
Mark Bayliss, AXO Southampton
Sally Pavey, CAGNE
Anne Marie Nixey, No Night Flights (Manston)
Jenny Dawes, campaigner against reopening Manston
Stephen Clarke, Bristol Airport Action Network (BAAN)
John Adams, Stop Bristol Airport Expansion (SBAEx) campaign
Rachael Webb, PAIN (People Against Airport Intrusive Noise)
Paul Beckford, Coordinator, HACAN
Paul McGuinness, No Third Runway Coalition

Cc: Robert Courts MP, Parliamentary Under Secretary of State, Department for Transport