



Appeal by: Bristol Airport Limited

Appeal Reference: APP/D0121/W/20/3259234

North Somerset Council Application Reference: 18/P/5118/OUT

**Summary proof of evidence of
Dr Mark Hinnells PhD, MSc, MA, BA
Carbon Emissions**

Reference: NSC/W6/2

Ricardo Energy and Environment



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Summary of Proof of Evidence of Mark Hinnells on Carbon Emissions on behalf of N Somerset Council:

Bristol Airport Ltd Planning Appeal

PINS Appeal ref APP/D0121/W/20/3259234

Planning Application ref 18/P/5118/OUT

Report ref ED14606101 for N Somerset Council

1 Name and qualifications

1. My name is Dr Mark Hinnells. I am a Senior Consultant with Ricardo Energy and Environment (Ricardo), a trading name of Ricardo-AEA Ltd. At Ricardo I lead work aiming at significant carbon emissions reductions for large sites including airports. My three decades in energy and environmental policy spans Government, academia and the private sector.

2 Scope of evidence

2. Following meetings of its planning committee, one of the four reasons for refusal was based on the climate effects of the proposed development, as follows:

“The scale of greenhouse gas emissions generated by the proposed increase in passenger numbers would not reduce carbon emissions and would not contribute to the transition to a low carbon future and would exacerbate climate change contrary to the National Planning Policy Framework, policy CS1 of the North Somerset Core Strategy 2017. and the duty in the Climate Change Act 2008 (as amended) to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline .”

3. This proof of evidence sets out the matters that remain of concern regarding carbon emissions and climate change related impacts, and to which I believe a decision maker needs to give consideration and weight when determining this appeal.

3 Summary and conclusions

Summary

4. Climate Change policy has been changing rapidly. It has evolved since the application and first Environmental Statement was submitted in December 2018, and the decision in March 2020. It has evolved since the submission of the appeal and it will continue to evolve after Proofs are submitted and prior to the presentation of evidence at the Inquiry into this appeal.
5. Given the rapid and continuing change in this field, I reserve my right to change my advice to NSC, and NSC reserves the right to update its case in respect of the greenhouse gas implications of the Proposed Development in order to reflect any changes in the policy context as and when they arise.
6. This proof shows the chronology of policy development covering both aviation and climate change policy, at UK national level and international level. The rapidly changing policy is presented in sections against the timescale of the application for planning permission at Bristol Airport and this appeal, to show what has or has not been considered at each stage of the planning process.
7. The Proof covers planning policy both at local level (CS1 and 2) and national level (NPPF)

8. In summary the widespread expectation of airport development had been growth, in a period of a proposed 80% cut in UK carbon emissions. However consent decisions are now being made in a period where policy has changed and the adoption of the net zero target for 2050 and the 6th carbon budget 6CB of a 78% reduction for the period 2033-37, including aviation, have significant implications for the determination of the carbon related issues arising in this appeal.
9. . There is a clear collision of expectation of airports on the one hand and climate policy needs on the other. The headline conclusion of this proof is that there is not the evidence base for the application to be approved.
10. Trading emissions in another sector off against aviation is no longer possible because all sectors are required to attain net zero. Unlike the position when the target was 80% reduction, the net zero target means that there are no “spare” emissions in other sectors to offset between now and 2050.

MBU

11. MBU includes (CD6.4) include policy approaches which are out of date based and assessed as they were in the context of a statutory obligation to achieve 80% carbon reductions compared to 1990 levels and not net zero. The conclusion in MBU that greater use can be made of existing runway capacity without impinging upon climate change targets is no longer correct. The result is that MBU cannot be relied upon in this regard and should be given little weight.
12. In addition to that, even if MBU had any validity, its target additions in Tables 1, 2, and 3, have been or are likely to be met by decisions made before the conclusion of this appeal. The ‘first come first served’ nature of MBU has been used.

Current policy

13. Whilst the Government has adopted net zero, the overall 6CB and determined that international aviation should be included in the UKs targets, it has not yet identified how these targets will be achieved generally nor specifically within the aviation sector, though such policy may be announced shortly and I reserve the right to change my recommendation to the LPA.

Mitigations

14. Whilst the CCCAP is welcome, it does nothing to guarantee an emissions trajectory that is consistent with sixth carbon budget (2033-37) and net zero in 2050 including aviation.
15. It is no answer to suggest that there are mitigations such as Sustainable Aviation Fuel, or other technologies, since these are in their technical and commercial infancy and no guarantee can be placed on them, and thus little weight should be placed on them in the planning balance.

Significance

16. The work by the CCC to support its path to net zero in the 6CB demonstrates that the achievement of net zero by the aviation sector will not be possible even with growth restricted to

just 25% to 2050 and with no additional airport capacity provided. The aviation sector will be reliant upon greenhouse gas reduction measures in order for the UK to achieve net zero.

17. If all five airports ((Stansted, Leeds, Southampton, Luton and Bristol)) are consented following conclusion of the relevant planning processes this would imply an additional 13mppa by 2030 because of MBU (CD6.4), and MBU (CD6.4) only foresaw an extra 1m by 2030, and an extra 11.8 by 2050 and thus Government needs urgently to review it in the light of 6CB decisions as well as net zero in 2050
18. As time progresses the aviation sector will form a larger and larger proportion of UK carbon emissions, indeed the old 37.5MtCO₂ 'planning assumption' would become more than 100% of UK emissions by 2045. Thus, the importance of net additions to carbon emissions will increase over time.
19. The significance of the development in carbon terms should be weighed against net zero, not against 37.5MtCO₂ or 23MtCO₂
20. BAL has not demonstrated that carbon emissions with the proposed development will be the same or less as those if planning permission is refused. Indeed, quite the reverse is the case – granting planning permission will result in an increase in carbon emissions associated with the airport.
21. BAL has not demonstrated that in the sixth carbon budget period (2033-37) and forwards to 2050 there will be mitigation measures available to address the net addition to the UK's carbon emissions which the operation of the airport will represent.

Prematurity

22. BAL has not demonstrated that all of the expansion plans of all of the airports in the UK can be accommodated with the available mitigation measures in the sixth carbon budget period and forward to 2050. Indeed, it has not carried out any kind of cumulative impact assessment.
23. It is no answer to contend that airport expansion schemes should be permitted since their use can be subsequently regulated by central Government introducing controls to inhibit the use of any increase in capacity.
24. If in reality a proportion of the benefits of a scheme will not be capable of coming forward, or there is a substantial risk that it will not, then that proportion of the benefits must not be taken into account by a planning decision maker or it should be given limited, if any, weight in the planning balance.
25. A choice has to be made as to which airport expansion plans should come forward and which should not. That choice can only be made at a national level by Government via a comparative exercise which examines all of the competing potential airport expansion proposals against a wide range of considerations relevant to the achievement of sustainable development (i.e. the economic social and environmental objectives of sustainable development). In such an exercise,

all of the competing expansion proposals, including the Proposed Development, would need to be considered and compared, with only the highest ranked being selected to come forward and to utilise the carbon budget available and which can be offset. The decision as to which airports can expand and which cannot is a matter of central Government and not for determination in a Section 78 appeal. That comparative exercise has not been undertaken.

26. Since the grant of planning permission would prejudge the outcome of that exercise, to grant planning permission for appeal scheme now would be premature.

Conclusion

27. It has not been demonstrated that the Proposed Development will not have a material impact on the Government's ability to meet its carbon reduction targets or the interim carbon budgets.
28. The Council's position is that the BAL proposal is inconsistent with the attainment of sixth carbon budget reductions of 78% by 2033-37 and Net Zero target in 2050, and is contrary to the NPPF (in particular paras. 7 and 148) (CD5.8), policy CS1 of the CS and the duty in the CCA 2008 (as amended) (CD9.7) to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline. This remains largely as stated in the reasons for refusal, though updated by sixth carbon budgets and inclusion of aviation in UK targets.



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